

EPA Registration Jacket
55541-2 Volume 4

Overview of Bushwacker Bear Repellant Registrations

Starting in 1986, Bushwacker began trying to register a capsaicin bear repellant product with the EPA. After many years of failed attempts, the EPA ultimately never registered their first proposed product 55541-R. However, in 1997, EPA did submit to Bushwacker a list of the requirements necessary to get such a product registered. With regards to tox study requirements, this list only identified eye irritation and skin irritation as required.

Starting in 1997, Bushwacker began trying to register a new product, claiming similarity to 55541-R, this time with the AI at 1.73%. In correspondence dated January 22, 1998, EPA notes data gaps causing the application to be deficient. These data gaps were in storage stability, corrosion characteristics, and explodability. In the same letter, Bushwacker was asked to upgrade the product chem guideline 830.6315 by determining the flame extension of the product and report of any flash back. Otherwise, the application as deemed acceptable. This means that the following MRIDs were passed, minus the deficiencies already stated:

44336901 – product chemistry
44336902 – product chemistry
44336903 – primary skin
44336904 – primary eye

Ultimately, 55541-2 was registered on May 12, 1998.

55541-2 was later amended (NOT a new application) to bump up the %AI to 2% in attempt to compete with competitors. The application was submitted to EPA on November 24, 2003. On July 8, 2004, EPA sent a letter to Bushwacker indicating that found the chemistry, acute toxicity, and efficacy data acceptable. This determination involved finding the following MRIDs acceptable:

46136701 - product ident, analytical method, phys chem properties
46136702 – primary eye
46136703 – primary skin
46136704 – primary eye

Bushwacker is now trying to submit a new product registration application (B660) to essentially re-introduce 55541-2 back in its original format, at 1.73% AI. In support of this application, Bushwacker submitted the following key (product chemistry, toxicity) MRIDs (Yellow Highlight indicates same MRID from 2% amendment; Green Highlight indicates same MRID from original 1.73% registration)

44336901 – product chemistry
44336902 – product chemistry
44336903 – primary skin
44336904 – primary eye

46136701 - product ident, analytical method, phys chem properties
46136702 – primary eye

46136703 – primary skin
46136704 – primary eye

Thus, there is, at least theoretically, a 100% overlap in tox and product chem data submitted from past applications. Labeling is identical to 55541-2 other than the different AI %.

Resolution:

55541-R jacket was obtained from Federal Records and contents indicate that only primary skin and primary eye studies were required, bolstering the registrant's request for a waiver of the other 4 studies in the "six pack."

In a July 28, 2016 deficiency letter, EPA conveyed to Bushwacker its findings of deficiencies regarding several of the MRIDs referred to above.

On August 11, 2016, Bushwacker responded to the deficiency letter.

On August 18, 2016, EPA Scientist Russ Jones found the submission addressed all of EPA's deficiency concerns and the product was moving to final approval in advance of the September 2, 2016 PRIA deadline.

PROCESSING REQUEST

Reg # 55541-2

Decision # 509638

511549

Description: Final Printed Label

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

☒ Dated: 07/27/2016

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☐ New CSF(s)

Dated:

☐ Other:



File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Sandra Owusu-Ansah

Division: BPPD

Phone: 703-347-0350

Date: 07/27/2016

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number FINAL
Application for Pesticide - Section I			
1. Company/Product Number 55541-2	2. EPA Product Manager Andrew Bryceland	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) Bushwacker Backpack and Supply Company, DBA Counter Assault /Counter Assault Bear Deterrent	PM# Biochemical Pesticides Branch, Biopesticides and Pollution Prevention Division (BPPD)		
5. Name and Address of Applicant (Include ZIP Code) Bushwacker Backpack & Supply Company DBA Counter Assault c/o Delta Analytical Corp. 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904 <small>Check if this is a new address</small>	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____		
Section - II			
<input type="checkbox"/> Amendment - Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.		<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 11/10/2015 <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - explain below.	
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Final printed label per EPA stamped letter dated 11/10/2015.			
Section - III			
1. Material this Product will be Packaged in:			
Child-Resistant Packaging <input type="checkbox"/> Yes* For retail <input type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Unit Package wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Unit Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container		5. Location of Label Direction <input type="checkbox"/> On Label or: <input type="checkbox"/> On Labeling accompanying product
6. Manner In Which Label Is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other:			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Cristina Griffin	Title Agent for Counter Assault	Telephone No. (Include Area Code) 301-680-7971	
Certification			6. Date Application Received (Stamped)
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
2. Signature 	3. Title Agent for Counter Assault		
4. Typed Name Cristina Griffin	5. Date November 30, 2015		



November 30, 2015

Document Processing Desk (FINAL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Andrew Bryceland, Team Leader, Biochemical Pesticides Branch, Biopesticides and
Pollution Prevention Division (BPPD)/ Colin Walsh

Re: Final label as per EPA notification approval letter of 11/10/15
Product: Counter Assault Bear Deterrent
EPA Reg. No.: 55541-2
Company: Bushwacker Backpack and Supply Company, DBA Counter Assault

Dear Mr. Bryceland:

On behalf of Bushwacker Backpack and Supply Company, DBA Counter Assault (Counter Assault), I am submitting the final label for Counter Assault Bear Deterrent, for EPA Reg. No. 55541-2 in response to EPA's approval of the alternate brand name notification. There were no modifications requested in the EPA approval letter dated 11/10/15.

The following documents are enclosed in support of this notification:

- EPA form 8570-1
- 1 copy of Label

If you have questions, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely,

Cristina Griffin

Agent for Bushwacker Backpack & Supply Company DBA Counter Assault

cc: George Hyde, Counter Assault

FINAL PRINTED LABEL CHECKLIST

CHECKLIST VERSION: JUNE 17, 2016

OPPIN Action Code: 400

EPA Reg. No: 55541-2**Submission Date: 9/02/15 and 11/10/2015/24/2015****RAL Name: Sandra Owusu-Ansah**

	Checklist Item	Yes	No	N/A
1.	Is the application form (EPA Form 8570-1) signed and complete? <ul style="list-style-type: none"> If NO, STOP! Contact applicant and have them correct the application. Note: Section III is oftentimes left blank; this is addressed below. 	X		
2.	Label in conformance with current <u>Label Review Manual</u>? Note: OK if some items are placeholders in brackets or XXX-XXX	X		
a.	Restricted Use Pesticide statement (if applicable)	X		
b.	Product name, brand, or trademark	X		
c.	Ingredient statement including nominal concentration of active ingredient (AI)? Microbial: strain designation and potency designation	X		
d.	Microbial: Viability			X
e.	"Keep Out of Reach of Children" (KOOROC) Statement	X		
f.	Signal Word	X		
g.	First aid statement	X		
h.	Net contents/net weight	X		
i.	EPA Reg. No. and Establishment No.	X		
j.	Company name and address	X		
k.	Precautionary statement: Hazards to Humans and Domestic Animals Microbial: Dust Mask Statement	X		
l.	Environmental hazards	X		
m.	Physical and chemical hazards (if applicable)	X		
n.	Directions for Use (pay particular attention to <u>targeted pests</u> and <u>use sites</u>)	X		
o.	Worker Protection Standard (WPS) language (if applicable)	X		
p.	Storage and Disposal <ul style="list-style-type: none"> Do these instructions agree with the container types listed on Section III of 8570-1? If Section III is empty, check if the instructions agree with past master label or FPL in jacket. 	X		
q.	Warranty Statement (not required, but must be evaluated if submitted)	X		
r.	Batch Code (required if non-refillable container)	X		
3.	Does Final Printed Label only contain items found on previously approved labels? Note: This may not always be the most recent label and, for example, use sites may be deleted so product can be marketed to a specific audience.	X		
4.	Are marketing claims approved? <ul style="list-style-type: none"> If NO, see Team Leader to notify them. The FPL is unacceptable. 	X		

5.	Are graphics acceptable? <ul style="list-style-type: none">Do the graphics suggest use patterns not approved by the label? Are they false or misleading?Please see resources like the <u>Chapter 16 of the Label Review Manual</u> and the <u>Repellency Graphic Guidance</u>.	X		
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If all above is cleared:

- Stamp the label with the "Complies with EPA Accepted Labeling" and then note the date of the application and the date on which you are approving the label.
- Place application package and stamped label in product jacket.
- Use Code 1300 to close out action in OPPIN.

Date: 7/27/2016

owusu-Ansah

BUSHWACKER² Bear Spray



Active Ingredient:
Capsaicin and related capsaicinoids* 2.00 %
Other Ingredients 98.00 %
TOTAL 100.0 %

*Derived from Oleoresin of Capsicum

NOT FOR USE ON HUMANS TO DETER BEARS FROM
ATTACKING HUMANS
KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Manufactured by:
Bushwacker Backpack & Supply Co., Inc.
dba Counter Assault
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY NUMBER: 1-800-535-5053
EPA Registration #55511-2 EPA Est. No. #55511-MT-001
NET CONTENTS: 8.1 ounces (230g)

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

DANGER:

May cause reversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130 F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE. Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Bushwacker Backpack & Supply Co., Inc. or its manufacturer shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans. Such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (Fig 1).

Depress actuator tab for burst of spray (Fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (Fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

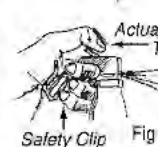
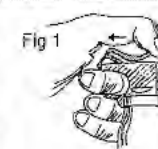


Fig 3

BUSHWACKER BEAR SPRAY



230g
Canister
empties in
approximately
7 Seconds
Sprays
up to
30 Feet
(9 Meters)

For use
on all
bear
species
to deter
bears
from
attacking
humans

BUSHWACKER² BEAR SPRAY

Directions for use: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using product. Do not eat or allow to be eaten any food or feed materials which may have been contaminated with this product.

This product has a range of up to 30 feet (approximately 9 meters).
The canister empties in approximately 7 seconds.

Application Directions: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with the procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately.

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To Disarm: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (Fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

Precautionary Statements: Hazards to Humans and Domestic Animals.

Danger: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid: If In Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

If On Skin Or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

Physical or Chemical Hazards: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130 degrees F may cause bursting.

Storage: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where temperature is above 120 degrees F nor below 32 degrees F. Do not store in a hot vehicle or in direct sunlight.

Disposal: DO NOT PUNCTURE OR INCINERATE! Non-refillable container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available.

Disclaimer: To the extent allowable by law, Bushwacker Backpack & Supply Co., Inc. or its manufacturer shall not be liable for damage, injury, loss, direct or consequential including death, arising out of the use of, or inability to use this product.

Net Contents
8.1 ounces (230g)

Manufactured by:
Bushwacker Backpack & Supply Co., Inc.
dba Counter Assault
120 Industrial Court
Kalispell MT 59901
Chemical Emergency 1-800-535-5053

Item # B-12H

UPC

Complies with
EPA Accepted Labeling

Date: 7/27/2007

Reviewer: S. W. W. W. W. W.

Reviewer: S. Giese-Gansel

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PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

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IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:
Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®

BEAR DETERRENT

GRIZZLY TOUGH PEPPER SPRAY

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN
DANGER



DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0%
Other Ingredients	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.

dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 8.1 ounces (230g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has *no* deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

**This product has a range of up to 30 feet (9 meters).
The canister empties in approximately 7 seconds.**

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. *Do not* test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

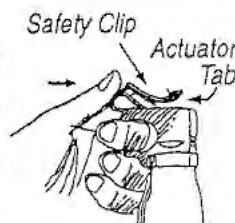
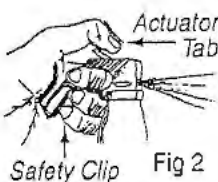
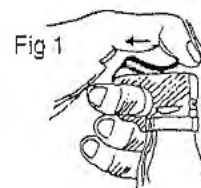
To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



EPA REG. #55541-2

DEVELOPED IN CONJUNCTION
WITH THE UNIVERSITY OF MONTANA

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
tie
string

Complies with
EPA Accepted Labeling

Date: 7/27/2016

Reviewer: _____

Sprays to 30 feet 7 seconds of spray time



Produced by a
Grizzly Bear
Encounter
Survivor!

(story on reverse)



2

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

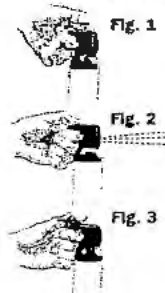
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PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Black Bear



Taller ears
No shoulder hump

Straight face profile



Grizzly Bear



Short rounded ears
Shoulder hump

Dished face profile



NET CONTENTS:
8.1 ounces (230g)

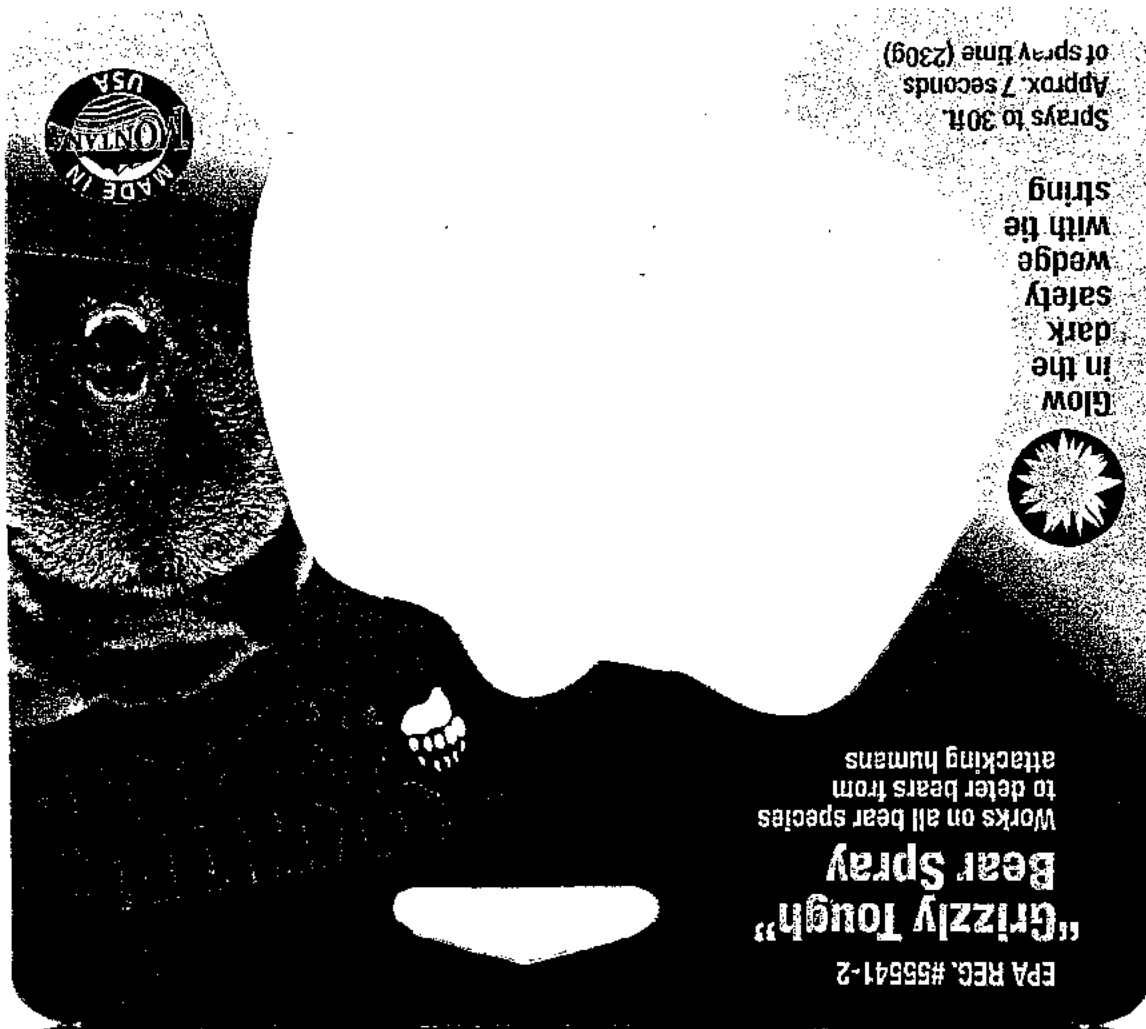
Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12H/sb



7 22031 41425 9



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12/psb



7 22031 41438 9

NET CONTENTS: 8.1 ounces (230g)

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY
MAGNUM 290

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS



KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0 %
Other Ingredients	98.0 %
TOTAL	100.0 %

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

170 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 10.2 ounces (290g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten with food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

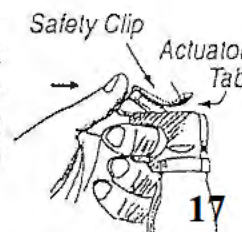
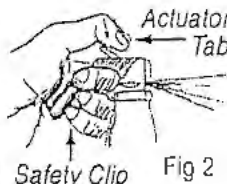
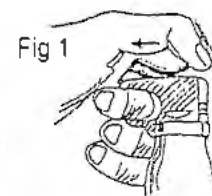


Fig 3

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
the
string

Sprays to 32 feet 9 seconds of spray time

MAGNUM 290
10.2 ounces
(290g)

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curd. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

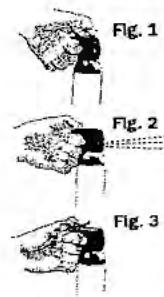
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.



Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Black Bear

Front claw
1 1/2" long



Front track

Taller ears
No shoulder hump

Straight face profile



Grizzly Bear

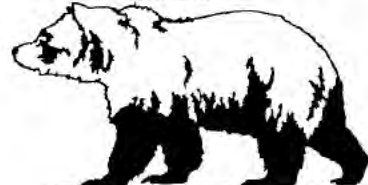
Front claw
2-4" long



Front track

Short rounded ears
Shoulder hump

Dished face profile



Item# CA18H/sb

NET CONTENTS:
10.2 ounces (290g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053



7 22031 4194 0



EPA REG. #55541-2
"Grizzly Tough"
Bear Spray
 Works on all bear species
 to deter bears from
 attacking humans

Glow
 in the
 dark
 safely
 wedges
 with the
 sting
 Sprays to 25 ft
 Approx. 8 seconds
 (20067) adult

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

**COUNTER
 ASSAULT**

Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
 dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
 1-800-535-5053

Item# CA18/psb



NET CONTENTS: 10.2 ounces (290g)

"Grizzly Tough" Bear Spray Magnum Value Pack

Produced by
Grizzly Bear
Encounter
Survivor!
(story on reverse)

Works on all bear
species to deter
bears from
attacking humans



Both include
glow in the
dark safety
wedge with
tie string

Sprays to 32 feet - approx. 3 seconds of spray time (230g)

Sprays to 32 feet - approx. 3 seconds of spray time (290g)

8.1 ounces
(230g)

MAGNUM 290
10.2 ounces
(290g)



DEVELOPED
IN
CONJUNCTION
WITH THE
UNIVERSITY
OF MONTANA



NET CONTENTS:
10.2 ounces (290g)

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

NET CONTENTS:
8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

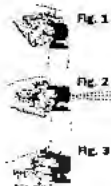
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



Grizzly Bear



Item# CA-12H18H/sb



**COUNTER
ASSAULT**

"Grizzly Tough" Bear Spray Value Pack

Works on all bear
species to deter
bears from
attacking humans

EPH 8611, AUGUST 02

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)



Includes
glue in
the dark
safety
wedge
with
the spray

Shrubs to 30 feet (approx. 5 minutes of spray time (200g))

**0.7 ounces
(200g)**

Shrubs to 30 feet (approx. 5 minutes of spray time (200g))

**0.7 ounces
(200g)**



SEALLED
IN
ECONOMY
WITH THE
UNIVERSITY
OF WYOMING



NET CONTENTS:

Combo Pack: TWO - 8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container; apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kellspeil, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



Grizzly Bear



Item# CA-12HVP/sb



USE INSTRUCTIONS

1. **Empty:** Press valve to release all pressure then place in trash or offer for recycling if available. **Partly filled:** Call your local solid waste agency for disposal instructions.

2. **First Aid:** Shake can and then spray into gently with water for 1-2 minutes. Rinse and break after 15-20 minutes. Then continue rinsing skin. Call poison control center or doctor for treatment advice. Make product harmless with you when calling or going for treatment. For emergency medical treatment information call 1-800-453-5885.

3. **First Aid (continued):** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 120° F may cause burning.

STORAGE & DISPOSAL: **STORAGE:** STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where temperature is above 120° F or below 32° F. Do not store in hot vehicle or direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. **If Empty:** Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.



THIS IS A
TRAINING CANISTER ONLY
AND IS NOT BEAR SPRAY
Does not contain the active
ingredient of bear spray

Not for use on Humans

The Black Canister is NOT Bear
Spray and is for Training
Purposes Only.
The Red Can is Bear Deterrent

DANGER

KEEP OUT OF REACH OF CHILDREN

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

**NET CONTENTS: 8.1 ounces
(230g)**

INERT TRAINER

HOW TO USE

1. **Empty:** Press valve to release all pressure then place in trash or offer for recycling if available. **Partly filled:** Call your local solid waste agency for disposal instructions.

2. **First Aid:** Shake can and then spray into gently with water for 1-2 minutes. Rinse and break after 15-20 minutes. Then continue rinsing skin. Call poison control center or doctor immediately for treatment advice. Make product harmless with you when calling or going for treatment. For emergency medical treatment information call 1-800-453-5885.

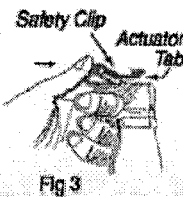
To Arm and Activate

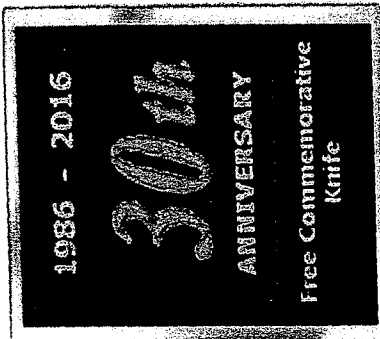
Designed for immediate deployment. Place finger through hole in handle with thumb on safety clip out. With thumb, pull safety clip straight back and off (Fig 1).

Depress actuator tab for burst of spray (Fig 2).

Pretend to aim at face and eyes of a bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the pretend bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.





SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

George Hyde
Bushwocker Backpack
& Supply Company
D/B/A Counter Assault
120 Industrial Court
Kalispell, Montana 59901

2. Article Number
(Transfer from service label)

7008 3230 0000 9474 1866

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from Item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

U.S. Postal Service TM

CERTIFIED MAILTM RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

7008 3230 0000 9474 1866

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)

Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
Here

3/30/2016

Sent To

George Hyde Bushwocker Backpack & Supply

Street, Apt. No.

or PO Box No. 120 Industrial Court

City, State, ZIP+4

Kalispell, Montana 59901

PS Form 3800, August 2005

See Reverse for Instructions



United States
Environmental Protection Agency
Washington, DC 20460
MC 7511P
Official Business
Penalty for Private Use \$300

CERTIFIED MAIL



7008 3230 0000 9474 1866

*George Hyde
Bushwacker Backpack & Supply Company
D/B/A Counter Assault
120 Industrial Court
Kalispell, Montana 59941*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 30, 2016

George Hyde
Bushwacker Backpack & Supply Company
D/B/A Counter Assault
120 Industrial Court
Kalispell, Montana 59901

Subject: Counter Assault Bear Spray Chart

Dear Mr. Hyde,

This letter serves as a follow up to my telephone conversation with you on February 26, 2016. During that phone conversation, I informed you that the Counter Assault Bear Deterrent Chart that is posted on your website must either be removed or updated so that it is not false or misleading. During the conversation, you indicated that you were knowledgeable of changes to at least one of the current products that were listed. To date, the chart has neither been removed nor updated in any way.

Further, in a letter dated March 30, 2009 (P. Johnson/M. Johnson), EPA informed Mr. Johnson of Bushwacker Backpack & Supply Company that "this letter constitutes approval of the attached chart for use on your website." The chart that was attached to the EPA March 30, 2009 letter to the company, did not contain the statement "Chart EPA Approved March 30, 2009." Upon a recent examination of the chart on your company's website, we note that the chart does in fact contain the statement "Chart EPA Approved March 30, 2009." Please be advised that EPA in no way approved the inclusion of the phrase. Therefore, in this way, EPA considers the chart that is currently posted on the company website to be false and misleading and the chart must be updated or removed so that it is not false and misleading.

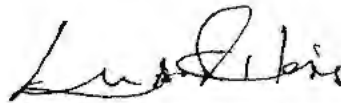
Please be advised that it is generally the responsibility of Bushwacker to update the chart and seek EPA approval to ensure that chart remains accurate and not misleading. Moreover, if changes have been made to the products listed on the current chart that was approved by the

EPA, Bushwacker is responsible for ensuring the chart is not false or misleading and should changes be necessary, Bushwacker must submit them to EPA.

EPA is aware that certain products that are currently listed on chart have changed in some way and the chart does not reflect the changes. For example, the UDAP pepper Power Bear Deterrent Spray has a 13.6 oz spray can size with a 35 feet spray distance and 7 second minimum spray time that is not listed. Because the chart is not up to date and accurate, the EPA considers the chart to be false and misleading. Again, you must immediately either remove the chart or update it so that it is accurate. You have 14 days (from the date of this letter) to take action. Should the chart remain unchanged post 14 days from the date of this letter, the EPA will refer the matter to our Office of Enforcement and Compliance.

Should you have any further questions regarding this matter, feel free to contact me at (703) 308-8733 or hollis.linda@epa.gov

Regards,



Linda A. Hollis, Chief
Biochemical Pesticides Branch
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division

Cc: Kirsten K. Johnson Bushwacker Backpack & Supply Company
Mark Hartman OPP/BPPD

PROCESSING REQUEST

Reg # 55541-2

Decision # 510830

Description: New ABN; graphics

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

☒ Dated:

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☐ New CSF(s) Dated:

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: A. Reighart

Division: BPPD

Phone:

Date: 2/24/16



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 10, 2015

Cristina Griffin
Agent for Bushwacker Backpack and Supply Company dba Counter Assault
Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – To add alternate brand name “Bushwacker² Bear Spray”
Product Name: Counter Assault Bear Deterrent
EPA Registration Number: 55541-2
Application Date: September 28, 2015
OPP Decision Number: 510830

Dear Ms. Griffin:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The alternate brand name, Bushwacker² Bear Spray, has been added to the product's records. You must submit one (1) copy of the final printed labeling with the modifications.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Page 2 of 2
EPA Reg. No. 55541-2
OPP Decision No. 510830

If you have any questions, please contact Colin G. Walsh of my team by phone at (703) 308-0298 or via email at walsh.colin@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew C. Bryceland". The signature is fluid and cursive, with a long horizontal stroke at the end.

Andrew C. Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

BUSHWACKER² Bear Spray



Active Ingredient:
Capsaicin and related capsinoids* 2.00 %
Other Ingredients 98.00 %
TOTAL 100.0 %

*Derived from Oleoresin of Capsicum

**NOT FOR USE TO DETER BEARS FROM
ON HUMANS ATTACKING HUMANS**
**KEEP OUT OF REACH OF CHILDREN
DANGER**

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Manufactured by:
Bushwacker Backpack & Supply Co., Inc.
dba Counter Assault
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY NUMBER: 1-800-535-5053

EPA Registration #55541-2 EPA Est. No. 065541-MT-001

NET CONTENTS: 8.1 ounces (230g)

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Bushwacker Backpack & Supply Co., Inc. or its manufacturer shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans. Such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

**This product has a range of up to 30 feet (9 meters).
The canister empties in approximately 7 seconds.**

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip and. With thumb, pull safety clip straight back and off (Fig 1).

Depress actuator tab for burst of spray (Fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (Fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

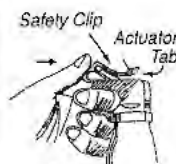
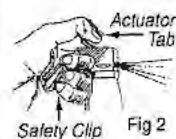
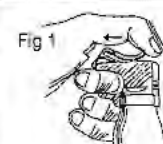


Fig 3



BUSHWACKER BEAR SPRAY

230g
Canister
empties in
approximately
7 Seconds
Sprays
up to
30 Feet
(9 Meters)

For use
on all
bear
species
to deter
bears
from
attacking
humans

BUSHWACKER² BEAR SPRAY

Directions for use: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using product. Do not eat or allow to be eaten any food or feed materials which may have been contaminated with this product.

**This product has a range of up to 30 feet (approximately 9 meters).
The canister empties in approximately 7 seconds.**

Application Directions: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with the procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (Fig 1). Depress actuator tab for burst of spray (Fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (Fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

Precautionary Statements: Hazards to Humans and Domestic Animals.

Danger: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid: If In Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

If On Skin Or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

Physical or Chemical Hazards: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130 degrees F may cause bursting.

Storage: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where temperature is above 120 degrees F nor below 32 degrees F. Do not store in a hot vehicle or in direct sunlight.

Disposal: DO NOT PUNCTURE OR INCINERATE! Non-refillable container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available.

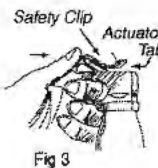
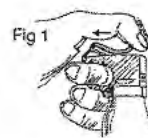
Disclaimer: To the extent allowable by law, Bushwacker Backpack & Supply Co., Inc. or its manufacturer shall not be liable for damage, injury, loss, direct or consequential including death, arising out of the use of, or inability to use this product.

**Net Contents
8.1 ounces (230g)**

Manufactured by:
Bushwacker Backpack & Supply Co., Inc.
dba Counter Assault
120 Industrial Court
Kalispell MT 59901
Chemical Emergency 1-800-535-5053

Item # B-12H

UPC



The following pages have no changes made to the current
approved label stamped September 2015

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT® BEAR DETERRENT

GRIZZLY TOUGH PEPPER SPRAY

NOT FOR USE
ON HUMANS



TO DETER BEARS FROM
ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0%
Other Ingredients	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 8.1 ounces (230g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

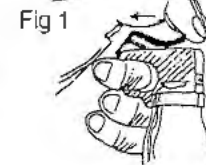
USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

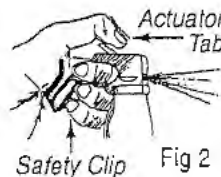
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To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).



Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.



To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

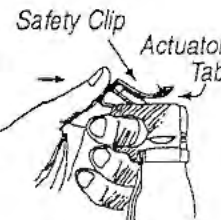


Fig 3

EPA REG. #59071-2

DEVELOPED IN CONJUNCTION
WITH THE UNIVERSITY OF MONTANA

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
tie
string

Sprays to 30 feet; 7 seconds of spray time



Produced by a
Grizzly Bear
Encounter
Survivor!

(story on reverse)



2

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

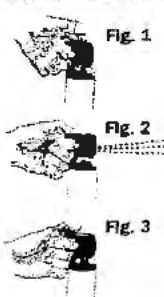
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.



Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Black Bear



Front claw
1 1/2" long



Front track

Taller ears

No shoulder hump

Straight face profile



Grizzly Bear



Front claw
2-4" long



Front track

Short rounded ears

Shoulder hump

Dished face profile



NET CONTENTS:
8.1 ounces (230g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12H/sb





Sprays to 30 ft
Approx. 7 seconds
of spr ne (230g)

Glow
in the
dark
safety
wedge
with tie
string



EPA REG. #55541-2
"Grizzly Tough"
Bear Spray
Works on all bear species
to deter bears from
attacking humans

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12/psb



7 22031 41438 9

NET CONTENTS: 8.1 ounces (230g)

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY
MAGNUM 290

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0 %
Other Ingredients	98.0 %
TOTAL	100.0 %

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.

d/b/a COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 10.2 ounces (290g)



DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten with food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (Fig 1).

Depress actuator tab for burst of spray (Fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (Fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

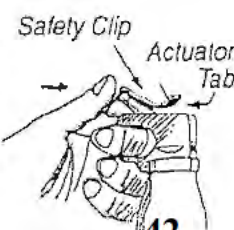
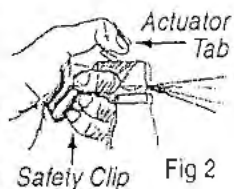
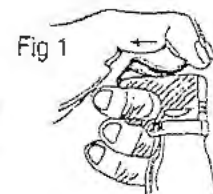


Fig 3

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
the
string

Sprays to 32 feet; 9 seconds of spray time



MAGNUM 290
10.2 ounces
(290g)

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

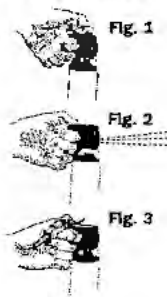
USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

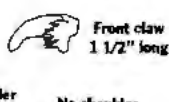
DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Black Bear



Grizzly Bear



NET CONTENTS:
10.2 ounces (290g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18H/sb





Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

**COUNTER
ASSAULT**

Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
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dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18/psb



NET CONTENTS: 10.2 ounces (290g)



"Grizzly Tough" Bear Spray Magnum Value Pack

Produced by
Grizzly Bear
Encounter
Survivor!
(story on reverse)

Works on all bear
species to deter
bears from
attacking humans



Both include
glow in the
dark safety
wedge with
tie string

Sprays to 30 feet; approx. 7 seconds of spray time (230g)

8.1 ounces
(230g)

Sprays to 32 feet; approx. 9 seconds of spray time (290g)

MAGNUM 290
10.2 ounces
(290g)



DEVELOPED
IN
CONJUNCTION
WITH THE
UNIVERSITY
OF MONTANA



NET CONTENTS:
10.2 ounces (290g)

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

NET CONTENTS:
8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



Grizzly Bear



Item# CA-12H/8H/sb



"Grizzly Tough" Bear Spray Value Pack

Works on all bear
species to deter
bears from
attacking humans

Produced by a
Grizzly Bear
Encounter
Survivor!

(story on reverse)



Includes
glow in
the dark
safety
wedge
with
tie string

Sprays to 30 feet; approx. 7 seconds of spray time (230g)

Sprays to 30 feet; approx. 7 seconds of spray time (230g)

8.1 ounces
(230g)

8.1 ounces
(230g)



DEVELOPE
IN
CONJUNCTI
WITH THE
UNIVERSIT
MONTANA



NET CONTENTS:
Combo Pack: TWO - 8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

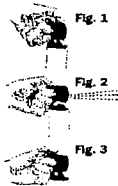
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

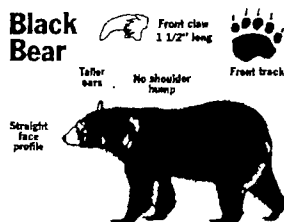
Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740




Item# CA-12/vP/sb



STORAGE & DISPOSAL:
STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where temperature is above 120° F nor below 32° F. Do not store in hot vehicle or direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If Empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.



**THIS IS A
TRAINING CANISTER ONLY
AND IS NOT BEAR SPRAY
Does not contain the active
ingredient of bear spray
Not for use on Humans**

The Black Canister is NOT Bear Spray and is for Training Purposes Only.
The Red Can is Bear Deterrent

DANGER
KEEP OUT OF REACH OF CHILDREN

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

**NET CONTENTS: 8.1 ounces
(230g)**

INERT TRAINER


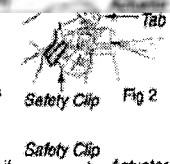
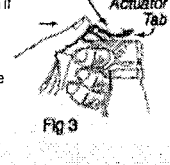
PHYSICAL OR CHEMICAL HAZARDS:
 Extremely Irritant. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 120° F may cause bursting.

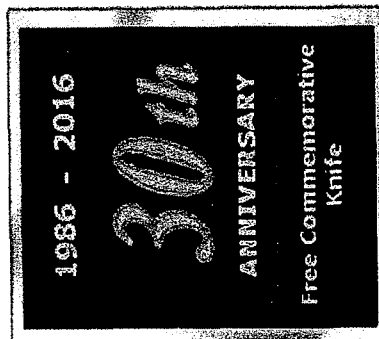
FOR USE AND CARE:
 Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip (see Fig. 1). Thumb and safety clip always back and off (Fig. 1).

DISARM: actuator tab for hand of spray (Fig. 2).

Pretend to aim at face and eyes of a bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the pretend bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (Fig. 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number
NOTIF

Application for Pesticide - Section I

1. Company/Product Number
55541-2

2. EPA Product Manager
Andrew Bryceland, Team
Leader

3. Proposed Classification
☐ None ☐ Restricted

4. Company/Product (Name)
Bushwacker Backpack and Supply Company, DBA Counter
Assault /Bushwacker² Bear Spray

PM#
Biochemical Pesticides Branch,
Biopesticides and Pollution
Prevention Division (BPPD)

5. Name and Address of Applicant (Include ZIP Code)

Bushwacker Backpack & Supply Company DBA Counter Assault
c/o Delta Analytical Corp.
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

☐ Check if this is a new address

6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(i), my
product is similar or identical in composition and labeling to:

EPA Reg. No.

Product Name

Section - II

☐ Amendment - Explain below
☐ Resubmission in response to Agency letter dated
☒ Notification - Explain below.

☐ Final printed labels in response to Agency letter dated **5/28/15**
☐ "Me Too" Application.
☐ Other - explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of alternate brand name and minor label changes.

Section - III

1. Material this Product will be Packaged in:

Child-Resistant Packaging
☐ Yes*
☐ No

Unit Packaging
☐ Yes
☐ No

Water Soluble Packaging
☐ Yes
☐ No

2. Type of Container

☐ Metal
☐ Plastic
☐ Glass
☐ Paper
☐ Other (Specify) _____

* **Certification must
be submitted.**

If "Yes,"
Unit Package wgt. No. per container

If "Yes,"
Unit Package wgt. No. per container

3. Location of Net Contents Information

☐ Label ☐ Container

4. Size(s) of Retail Container

5. Location of Label Direction

☐ On Label
☐ On Labeling accompanying product

6. Manner In Which Label Is Affixed to Product

☐ Lithograph
☐ Paper glued
☐ Stenciled

☐ Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name
Cristina Griffin

Title
Agent for Counter Assault

Telephone No. (Include Area Code)
301-680-7971

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title
Agent for Counter Assault

4. Typed Name
Cristina Griffin

5. Date
9/28/15

6. Date Application
Received

(Stamped)



September 28, 2015

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Colin Walsh/Andrew Bryceland, Team Leader, Biochemical Pesticides Branch,
Biopesticides and Pollution Prevention Division (BPPD)

Re: Notification per PR Notice 98-10 for alternate brand name (ABN) and minor label changes

Product: Bushwacker² Bear Spray

EPA Reg. No.: 55541-2

Company: Bushwacker Backpack and Supply Company, DBA Counter Assault

Dear Mr. Walsh:

On behalf of Bushwacker Backpack and Supply Company, DBA Counter Assault (Counter Assault), we are submitting a notification of an alternate brand name, Bushwacker² Bear Spray, for EPA Reg. No. 55541-2. In addition to the alternate brand name, the label includes changes to the layout and pictures from the current approved label (September 2015).

The ABN label does not supersede the current label on file, but is in addition to it; we have made no changes to the current label approved September 2015. However, we want to be sure all approved components stay together, so we have included both the approved and the ABN label, but have put a sheet between the approved and ABN explaining that nothing has changed on the basic product label.

The following documents are enclosed in support of this notification:

- EPA form 8570-1
- 1 copy of Label

If you have questions, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely, -

Cristina Griffin

Agent for Bushwacker Backpack & Supply Company DBA Counter Assault

cc: George Hyde, Counter Assault
Pride Johnson, Counter Assault



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 2, 2015

Cristina Griffin
Agent for Bushwacker Backpack and Supply Company dba Counter Assault
Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – To add a small pocket knife, engraved with Counter Assault logo, in the clam shell packaging of the pesticide product and include a sticker on the packaging with the following text, “Counter Assault – Celebrating 30 Years 1986-2016.”
Product Name: Counter Assault Bear Deterrent
EPA Registration Number: 55541-2
Application Date: July 22, 2015
OPP Decision Number: 507299

Dear Ms. Griffin:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped “Notification” and will be placed in our records. You must submit one (1) copy of the final printed labeling with the modifications.

Although BPPD has determined that this action falls within the scope of PRN 98-10, we would like to also indicate that since EPA’s authority for these product kits (pesticides packaged with non-pesticides) stops at the pesticide. EPA will not be offering any approval or disapproval on whether it is legal or proper to distribute a pocket knife (page 14 of label). You are responsible for ensuring that you are complying with any other federal laws and regulations that may govern the distribution of knives in commerce. BPPD also notes that your label contains a non-pesticide sublabel for an inert training canister (page 13 of label). The EPA has already reviewed this non-pesticide sublabel and deemed it acceptable in a previous label amendment action; however, this non-pesticide sublabel is not considered part of the stamped label (refer to EPA letter dated May 28, 2015 for further details).

Page 2 of 2
EPA Reg. No. 55541-2
OPP Decision No. 507299

If you have any questions, please contact Colin G. Walsh of my team by phone at (703) 308-0298 or via email at walsh.colin@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Andrew C. Bryceland". The signature is fluid and cursive, with the first name "Andrew" and last name "Bryceland" clearly legible.

Andrew C. Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

NOTIFICATION

55541-2

The applicant has certified that no changes other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification on its letter dated:

09/02/2015

COUNTER ASSAULT®

BEAR DETERRENT

GRIZZLY TOUGH PEPPER SPRAY

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS



KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0%
Other Ingredients	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 8.1 ounces (230g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

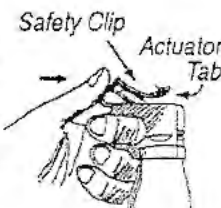
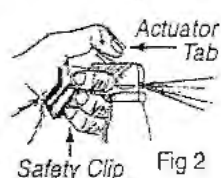
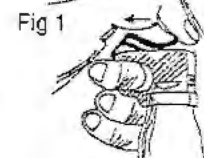
To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



EPA REG. #55541-2

DEVELOPED IN CONJUNCTION
WITH THE UNIVERSITY OF MONTANA

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
the
string

Sprays to 30 feet, 7 seconds of spray time



Produced by a
Grizzly Bear
Encounter
Survivor!

(story on reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.



Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Black Bear



Taller ears

No shoulder hump

Front track

Straight face profile



Grizzly Bear



Short rounded ears

Shoulder hump

Front track

Dished face profile



Item# CA12H/sb

NET CONTENTS:
8.1 ounces (230g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 267-4740
CHEMICAL EMERGENCY
1-800-535-5053





Sprays to 30 ft.
Approx. 7 seconds
of spray time (230g)

Glow
in the
dark
safety
wedge
with the
string

Works on all bear species
to deter bears from
attacking humans

"Grizzly Tough"
Bear Spray

EPA REG. #55541-2

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

**COUNTER
ASSAULT**

Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12/psb



NET CONTENTS: 8.1 ounces (230g)

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

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If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY
MAGNUM 290

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0%
Other Ingredients	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.

d/b/a COUNTER ASSAULT
170 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 10.2 ounces (290g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001



DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten with food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

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To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

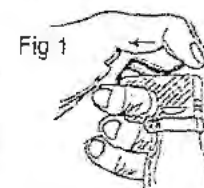


Fig 1

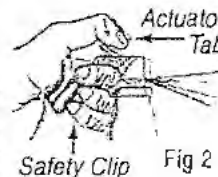


Fig 2

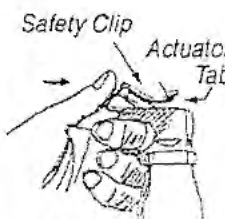


Fig 3

EPA REG. #5541-2

DEVELOPED IN CONJUNCTION
WITH THE UNIVERSITY OF MONTANA

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



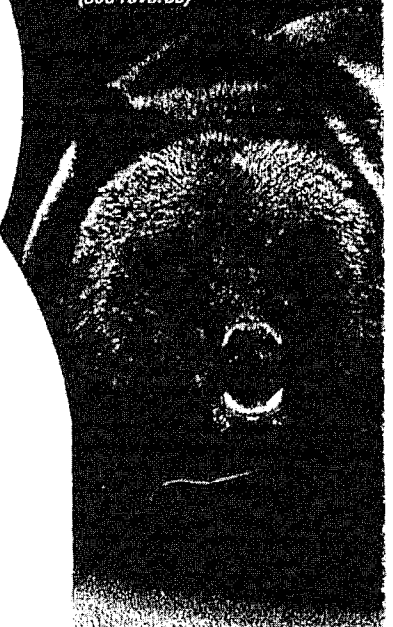
Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
tie
string

Sprays to 32 feet, 9 seconds of spray time



MAGNUM 290
10.2 ounces
(290g)

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

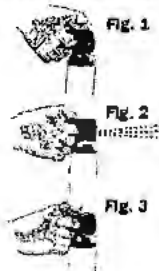
USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

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IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

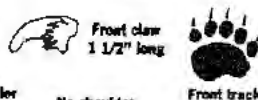
DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

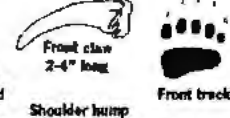
Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Black Bear



Grizzly Bear



NET CONTENTS:
10.2 ounces (290g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-595-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18H/sb





Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18/psb



NET CONTENTS: 10.2 ounces (290g)

**"Grizzly Tough"
Bear Spray
Magnum Value Pack**

Produced by
**Grizzly Bear
Encounter
Survivor!**
(story on reverse)

Works on all bear
species to deter
bears from
attacking humans



Both include
glow in the
dark safety
wedge with
tie string

Sprays to 30 feet; approx. 7 seconds of spray time (230g)

Sprays to 32 feet; approx. 9 seconds of spray time (290g)

**8.1 ounces
(230g)**

**MAGNUM 290
10.2 ounces
(290g)**



DEVELOPED
IN
CONJUNCTION
WITH THE
UNIVERSITY
OF MONTANA



NET CONTENTS: 10.2 ounces (290g)

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

NET CONTENTS: 8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the canister, apply the product and restore the safety clip to disarm the canister. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this canister, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (Fig. 1). Depress actuator tab for burst of spray (Fig. 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (Fig. 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contains under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Dushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740



Item# CA-12H18H/sb





"Grizzly Tough" Bear Spray Value Pack

Works on all bear
species to deter
bears from
attacking humans

EPA REG. #55541-2

Produced by a
Grizzly Bear
Encounter
Survivor!
(story on reverse)



Includes
glow in the dark
safety
wedge
with
tie string

Sprays to 30 feet, approx. 7 seconds of spray time (230g)

8.1 ounces
(230g)

Sprays to 30 feet, approx. 7 seconds of spray time (230g)

8.1 ounces
(230g)



DEVELOPED
IN
CONJUNCTION
WITH THE
UNIVERSITY
OF MONTANA



NET CONTENTS:
Combo Pack: TWO - 8.1 ounces (230g)

This product has a range of up to 30 feet (8 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

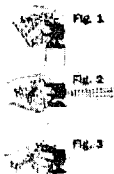
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

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STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

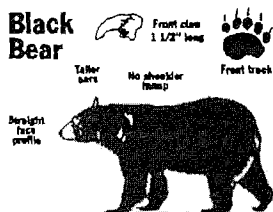
Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



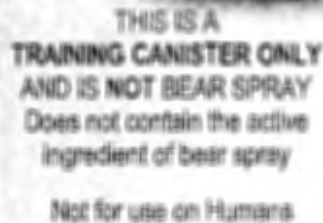
Grizzly Bear



Item# CA-12HVP/sb



Expresso Espresso. Contains under pressure. Easy pour from the spout and sealed surface. Thru-out procedure is foolproof and reliable. Expresso is temperate like other 100% Arabica coffee blends.



2. *Chlorophyll*

(fig 2).

Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the pretend bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

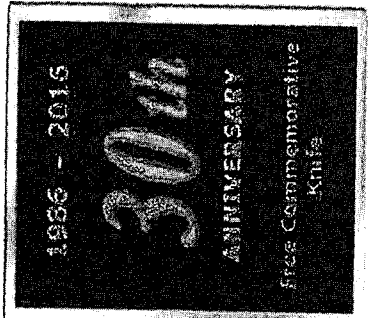


Fig. 3

Non-Refillable Container. Do not reuse or refill this container.
If Empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, COUNTER ASSAULT shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

INERT TRAINER



Walsh, Colin

From: Cristina Griffin <cgriffin@delta-ac.com>
Sent: Thursday, August 13, 2015 2:27 PM
To: Walsh, Colin
Cc: Debbie Davison
Subject: RE: Counter Assault question we discussed
Attachments: 55541-2 label EPA notif 072215.pdf

Colin,

Only the last page was added. There are no other changes.

This is a scanned copy and I know that EPA typically does not want a scanned copy. However, because this label is a marketplace label with several components, it is not available as a complete label in any other way.

Best regards,
Cristina Griffin
Delta Analytical Corporation
e-mail: cgriffin@delta-ac.com
phone: 301 680-7971
fax: 301 680-7975
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

From: Walsh, Colin [mailto:Walsh.Colin@epa.gov]
Sent: Thursday, August 13, 2015 11:53 AM
To: Cristina Griffin <cgriffin@delta-ac.com>
Subject: RE: Counter Assault question we discussed

Hi Cristina,

Can you email me an electronic copy of the label you submitted on July 22nd? I would prefer a redline copy (marked up) copy of the label since it was submitted as a notification.

Regards,

Colin

Colin G. Walsh, M.S.
Biologist, Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
walsh.colin@epa.gov
(703) 308-0298 (phone)
(703) 305-0118 (fax)
<http://www.epa.gov/pesticides/>

From: Cristina Griffin [mailto:cgriffin@delta-ac.com]
Sent: Tuesday, June 16, 2015 4:19 PM
To: Walsh, Colin
Subject: RE: Counter Assault question we discussed

Colin,

Thank you for your help.

Best regards,
Cristina Griffin
Delta Analytical Corporation
e-mail: cgriffin@delta-ac.com
phone: 301 680-7971
fax: 301 680-7975
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

From: Walsh, Colin [<mailto:Walsh.Colin@epa.gov>]
Sent: Tuesday, June 16, 2015 11:27 AM
To: Cristina Griffin
Subject: RE: Counter Assault question we discussed

Hi Cristina,

After consultation with our OGC, it has been determined that you can submit this change to us. You should submit it as a notification.

However, we would like to also indicate that since EPA's authority for these product kits (pesticides packaged with non-pesticides) stops at the pesticide, we would not be offering any approval or disapproval on whether it was legal or proper to distribute a pocketknife. You are responsible for ensuring that you are complying with any other federal laws and regulations that may govern the distribution of knives in commerce.

Please let me know if you have any further questions.

Regards,

Colin

Colin G. Walsh, M.S.
Biologist, Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
walsh.colin@epa.gov
(703) 308-0298 (phone)
(703) 305-0118 (fax)
<http://www.epa.gov/pesticides/>

From: Cristina Griffin [<mailto:cgriffin@delta-ac.com>]
Sent: Friday, June 12, 2015 2:09 PM
To: Walsh, Colin
Subject: Counter Assault question we discussed

Colin,

I know you are checking on this, I thought I'd write it out for you: As we discussed earlier this week, Counter Assault will be having its 30 year Anniversary in 2016 and they would like to commemorate it with their customers by including a small pocket knife, engraved with the Counter Assault logo, in the clam shell package of Bear Spray. They would also have a sticker on the packaging saying "Counter Assault – Celebrating 30 Years 1986-2016". Would it be acceptable to submit this to EPA as a notification of a non pesticidal change in labeling? (I am thinking that on the last page of the current EPA approved label, under optional label language, we would include a picture of the knife with logo, and a picture of the sticker.)

Thank you for your help.

Best regards,
Cristina Griffin
Delta Analytical Corporation
e-mail: cgriffin@delta-ac.com
phone: 301 680-7971
fax: 301 680-7975
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Receipt for Section 3

S: 971727 Wisconsin Email:

Regulatory Type: Product Registration - Section 3 Resubmission: ☐ Yes ☒ No

Application Type: Notification Fee For Service: ☐ Yes ☒ No

Company: 55541 BUSHWACKER BACKPACK & SUPPLY CO.

Risk Manager: Biological & Pollution Prevention Division, PM Team 91

Product #: 55541-2 Product Name: COUNTER ASSAULT DEAR DETERGENT

Overview:

We Sell: We Exp Product Name:

Section 2:

Application Date: 22-Jul-2015 OPP Rec'd Date: 24-Jul-2015

First Exp Date: 24-Jul-2015 Risk Manager Send Date: 24-Jul-2015

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

NOTIFICATION to make label change.

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

New Ingredient Request Date:

New Ingredient Received Date:

Paper Label:

Colin



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

NOTIF**Application for Pesticide - Section I**

1. Company/Product Number 55541-2	2. EPA Product Manager Linda Hollis, Branch Chief	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bushwacker Backpack and Supply Company, DBA Counter Assault /Counter Assault Bear Deterrent	PM Biopesticides and Pollution Prevention Division (BPPD)	
5. Name and Address of Applicant (Include ZIP Code) Counter Assault c/o Delta Analytical Corp. 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Notification Accepted Product Name _____ SEP 02 2015 Date: _____	

Section - IIReviewer: *C. Walsh*

☐ Amendment - Explain below
☐ Resubmission in response to Agency letter dated _____
☒ Notification - Explain below.

☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification to make minor label change.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III**1. Material this Product will be Packaged in:**

Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted.			
If "Yes," Unit Package wgt. No. per container		If "Yes," Unit Package wgt. No. per container	

3. Location of Net Contents Information

☐ Label ☐ Container

4. Size(s) of Retail Container**5. Location of Label Direction**

☐ On Label
☐ On Labeling accompanying product

6. Manner In Which Label Is Affixed to Product

☐ Lithograph
☐ Paper glued
☐ Stenciled

☐ Other _____

Section - IV**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

Name Cristina Griffin	Title Agent for Counter Assault	Telephone No. (Include Area Code) 301-680-7971
---------------------------------	---	--

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature <i>Cristina Griffin</i>	3. Title Agent for Counter Assault	6. Date Application Received (Stamped)
4. Typed Name Cristina Griffin	5. Date 7/22/15	



July 22, 2015

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Colin Walsh/Linda Hollis, Branch Chief, Biochemical Pesticides Branch,
Biopesticides and Pollution Prevention Division (BPPD)

Re: Notification per PR Notice 98-10 to make minor label change
Product: Counter Assault Bear Deterrent
EPA Reg. No.: 55541-2
Company: Bushwacker Backpack and Supply Company, DBA Counter Assault

Dear Mr. Walsh:

On behalf of Bushwacker Backpack and Supply Company, DBA Counter Assault (Counter Assault), we are submitting a notification to make a minor label change for the product Counter Assault Bear Deterrent, EPA Reg. No. 55541-2. As we explained by e-mail in June, Counter Assault will be having its 30 year Anniversary in 2016 and they would like to commemorate it with their customers by including a small pocket knife, engraved with the Counter Assault logo, in the clam shell package of Bear Spray. They also want to include a sticker on the packaging saying "Counter Assault – Celebrating 30 Years 1986-2016."

You checked with OGC and provided the following:

"After consultation with our OGC, it has been determined that you can submit this change to us. You should submit it as a notification.

However, we would like to also indicate that since EPA's authority for these product kits (pesticides packaged with non-pesticides) stops at the pesticide, we would not be offering any approval or disapproval on whether it was legal or proper to distribute a pocketknife. You are responsible for ensuring that you are complying with any other federal laws and regulations that may govern the distribution of knives in commerce."

The change is the last page of the enclosed label. Specifically:
"30th anniversary logo"

Picture of package with commemorative knife

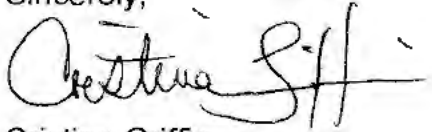
There are no other changes to the label that EPA approved on 5/28/15.

The following documents are enclosed in support of this notification:

- EPA form 8570-1
- One copy of the label; last page of label is the only change and is tabbed for your convenience

If you have questions, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cristina Griffin', with a stylized flourish at the end.

Cristina Griffin

Agent for Bushwacker Backpack & Supply Company DBA Counter Assault

cc: George Hyde, Counter Assault
Pride Johnson, Counter Assault

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS



KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0 %
Other Ingredients	98.0 %
TOTAL	100.0 %

***Derived from Oleoresin of Capsicum**

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 8.1 ounces (230g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

**This product has a range of up to 30 feet (9 meters).
The canister empties in approximately 7 seconds.**

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

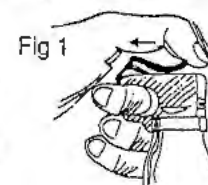


Fig 1

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

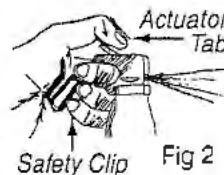


Fig 2

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

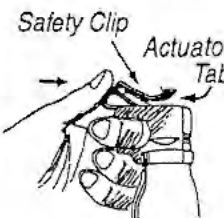


Fig 3

EPA REG. #55541-2

DEVELOPED IN CONJUNCTION
WITH THE UNIVERSITY OF MONTANA

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



**Glow
in the
dark
safety
wedge
with
tie
string**

Sprays to 30 feet; 7 seconds of spray time



**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

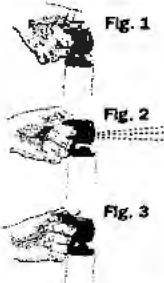
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.



Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Black Bear



Front claw
1 1/2" long



Front track

Taller ears

No shoulder hump

Straight face profile



Grizzly Bear



Front claw
2-4" long



Front track

Short rounded ears

Shoulder hump

Dished face profile



Item# CA12H/sb

NET CONTENTS:
8.1 ounces (230g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053



7 22031 41425 9



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:

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1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12/psb



7 22031 41438 9

NET CONTENTS: 8.1 ounces (230g)

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential, including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY
MAGNUM 290

NOT FOR USE
 ON HUMANS



TO DETER BEARS FROM
 ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0%
Other Ingredients	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:
 Bushwacker Backpack and Supply Co., Inc.
 dba COUNTER ASSAULT
 170 Industrial Court, Kalispell, MT 59901
 1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 10.2 ounces (290g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

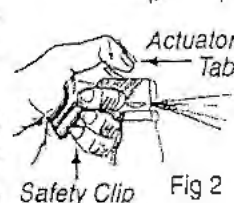
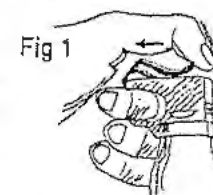
USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten with food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

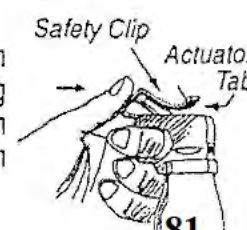
Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).



Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
tie
string

Sprays to 32 feet: 9 seconds of spray time



MAGNUM 290
10.2 ounces
(290g)

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

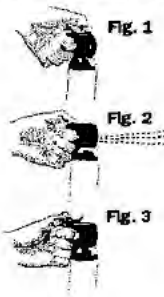
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.



Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Black Bear



Front claw
1 1/2" long



Taller ears

No shoulder hump

Front track

Straight face profile



Grizzly Bear



Front claw
2-4" long



Short rounded ears

Shoulder hump

Front track

Dished face profile



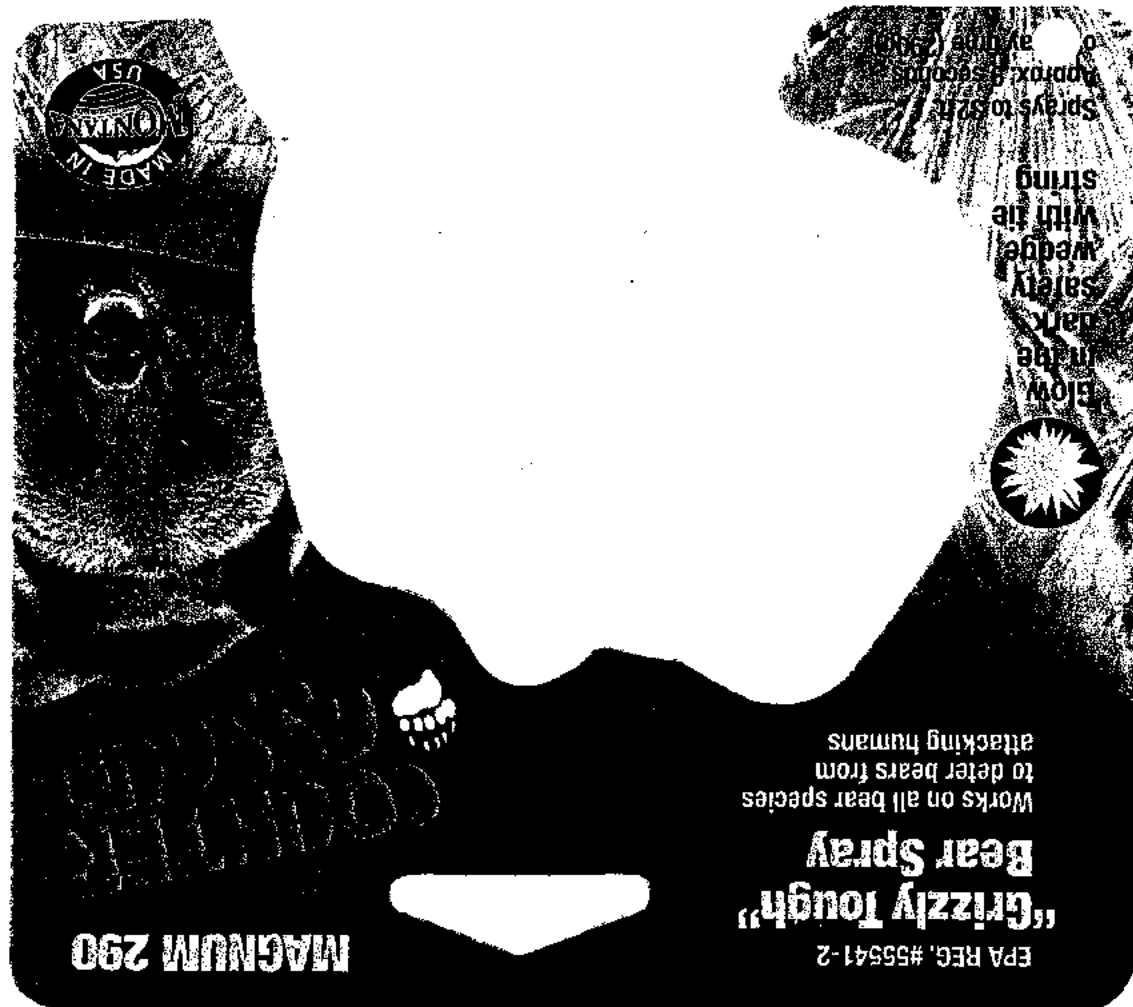
Item# CA18H/sb

NET CONTENTS:
10.2 ounces (290g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053





Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

**COUNTER
ASSAULT**

Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18/psb



NET CONTENTS: 10.2 ounces (290g)

EPA REG. #33347-2



"Grizzly Tough" Bear Spray Magnum Value Pack

Produced by
Grizzly Bear
Encounter
Survivor!
(story on reverse)

Works on all bear
species to deter
bears from
attacking humans



Both include
glow in the
dark safety
wedge with
tie string

Sprays to 20 feet; approx. 7 seconds of spray time (230g)

8.1 ounces
(230g)

Sprays to 32 feet; approx. 9 seconds of spray time (290g)

MAGNUM 290
10.2 ounces
(290g)



DEVELOPED
IN
CONJUNCTION
WITH THE
UNIVERSITY
OF MONTANA



NET CONTENTS:
10.2 ounces (290g)

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

NET CONTENTS:
8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip cut. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



Grizzly Bear



Item# CA-12H18H/sb



"Grizzly Tough" Bear Spray Value Pack

Produced by a
Grizzly Bear
Encounter
Survivor!

(story on reverse)

Works on all bear
species to deter
bears from
attacking humans



Includes
glow in
the dark
safety
wedge
with
the string

Sprays to 30 feet; approx. 7 seconds of spray time (230g)

8.1 ounces
(230g)

Sprays to 30 feet; approx. 7 seconds of spray time (230g)

8.1 ounces
(230g)



DEVELOPED
IN
CONJUNCTION
WITH THE
UNIVERSITY
OF MONTANA



NET CONTENTS:
Combo Pack: TWO - 8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

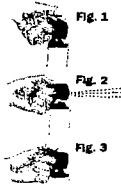
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

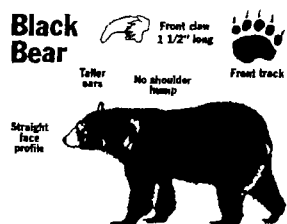
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Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



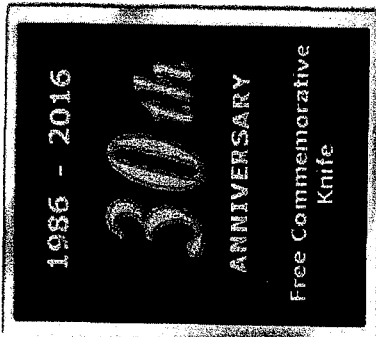
Grizzly Bear



Item# CA-12HVP/sb



7 2 2 0 3 1 4 1 4 2 6 6





July 2, 2015

Document Processing Desk (FINAL)
Office of Pesticide Programs (7504P)
Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Linda Hollis, Branch Chief, Biochemical Pesticides Branch, Biopesticides and Pollution Prevention Division (BPPD) (7511P)

Re: Final Label submission requested by EPA in letter dated 5/28/15
Product: Counter Assault Bear Deterrent
EPA Reg. No.: 55541-2
Company: Bushwacker Backpack and Supply Company, DBA Counter Assault

Dear Ms. Hollis:

On behalf of Bushwacker Backpack and Supply Company, DBA Counter Assault (Counter Assault), we are submitting the final label for the product Counter Assault Bear Deterrent, EPA Reg. No. 55541-2. In the EPA approval letter dated 5/28/15, we were asked to submit one copy of the final label; no changes to the label were requested.

Enclosures

- EPA form 8570-1
- 1 copy of final label
- EPA approval letter of 5/28/15

If you have any questions regarding this submission, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely,

Cristina Griffin

Agent for Bushwacker Backpack & Supply Company DBA Counter Assault

cc: Pride Johnson, Counter Assault
George Hyde, Counter Assault



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

FINAL**Application for Pesticide - Section I**1. Company/Product Number **55541-2**

2. EPA Product Manager

Linda Hollis, Branch Chief,

3. Proposed Classification

☐ None ☐ Restricted

4. Company/Product (Name) **Bushwacker Backpack and Supply Company, DBA Counter Assault /Counter Assault Bear Deterrent**

PM# **Biopesticides and Pollution Prevention Division (BPPD)**

5. Name and Address of Applicant (Include ZIP Code)

**Bushwacker Backpack & Supply Company DBA Counter Assault c/o Delta Analytical Corp.
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904**

☐ Check if this is a new address

6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

- ☐ Amendment - Explain below
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.

☒ Final printed labels in response to Agency letter dated **5/28/15**

- ☐ "Me Too" Application.
☐ Other - explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)**Final Label submission requested by EPA in letter dated 5/28/15.**

**Complies with
EPA Accepted Labeling
JUL 27 2015**

Date: _____

Section - IIIReviewer: C. Walsh**1. Material this Product will be Packaged in:**

Child-Resistant Packaging

- ☐ Yes*
☐ No

Unit Packaging

- ☐ Yes
☐ No

Water Soluble Packaging

- ☐ Yes
☐ No

2. Type of Container

- ☐ Metal
☐ Plastic
☐ Glass
☐ Paper
☐ Other (Specify) _____

* **Certification must be submitted.**

If "Yes,"

Unit Package wgt. No. per container

If "Yes,"

Unit Package wgt. No. per container

3. Location of Net Contents Information

- ☐ Label ☐ Container

4. Size(s) of Retail Container

5. Location of Label Direction

- ☐ On Label
☐ On Labeling accompanying product

6. Manner In Which Label Is Affixed to Product

- ☐ Lithograph
☐ Paper glued
☐ Stenciled

☐ Other _____**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name

Cristina Griffin

Title

Agent for Counter Assault

Telephone No. (Include Area Code)

301-680-7971**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title

Agent for Counter Assault

4. Typed Name

Cristina Griffin

5. Date

7/2/15

6. Date Application Received

(Stamped)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MAY 28 2015

Bushwacker Backpack & Supply Company dba Counter Assault
c/o Cristina Griffin
Agent
Delta Analytical Corporation
12510 Prosperity Drive
Suite 160
Silver Spring, MD 20904

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Adding new packaging, which combines the 8.1 oz product with an inert trainer canister.
Product Name: Counter Assault Bear Deterrent
EPA Registration Number: 55541-2
Application Date: December 22, 2014
OPP Decision Number: 498925

Dear Ms. Griffin:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

The U.S. Environmental Protection Agency (EPA) notes that you have submitted labeling that includes the sublabel for the inert training canister that contains no active ingredient. As noted in the EPA's Label Review Manual (LRM), Chapter 18, Section IV(A), the EPA has jurisdiction over the packaging and labeling of any "non-pesticide" which is part of the package (refer to 40 CFR 152.3). The EPA has reviewed your inert training canister sublabel and deemed it acceptable; however, the sublabel of your master label that contains this inert training canister label (pages 13-15) will not be part of the FIFRA stamped label. This determination is based on the EPA's LRM, Chapter 19, Section IV(A), which indicates, "The reviewer examines the non-pesticide labeling to determine whether it contains any language that conflicts with the pesticide label, but the reviewer does not actually stamp the non-pesticide label." Although the inert training canister label is not part of the FIFRA stamped label, if you decide to make changes to this label, you must submit it to the EPA for review.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may

distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Colin G. Walsh of my branch by phone at (703) 308-0298 or via email at walsh.colin@epa.gov.

Sincerely,



Linda A. Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

EPA Accepted Labeling

JUL 27 2015

Date:

C. Watson

Review

COUNTER ASSAULT®

BEAR DETERRENT

GRIZZLY TOUGH PEPPER SPRAY

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS



KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids* 2.0%

Other Ingredients 98.0%

TOTAL 100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.

dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 8.1 ounces (230g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

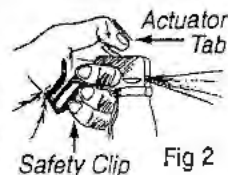
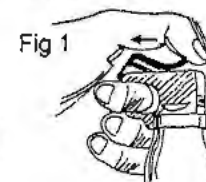
USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

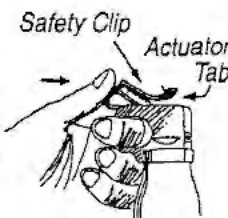
Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).



Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans

COUNTER ASSAULT.

Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.
(see reverse)



Learn
more
about
this
product
with
the
video

Always use 20 foot 7 second rule of spray when in danger

Produced by a
Grizzly Bear
Encounter
Survivor!

(see reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product (230g canister) has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



Fig. 1



Fig. 2



Fig. 3

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL, DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Center for Wildlife Information

Black Bear



Front claw
1 1/2" long



Front track

Taller ears

No shoulder hump

Straight face profile



Grizzly Bear



Front claw
2-4" long



Front track

Short rounded ears

Shoulder hump

Dished face profile



NET CONTENTS:
8.1 ounces (230g)

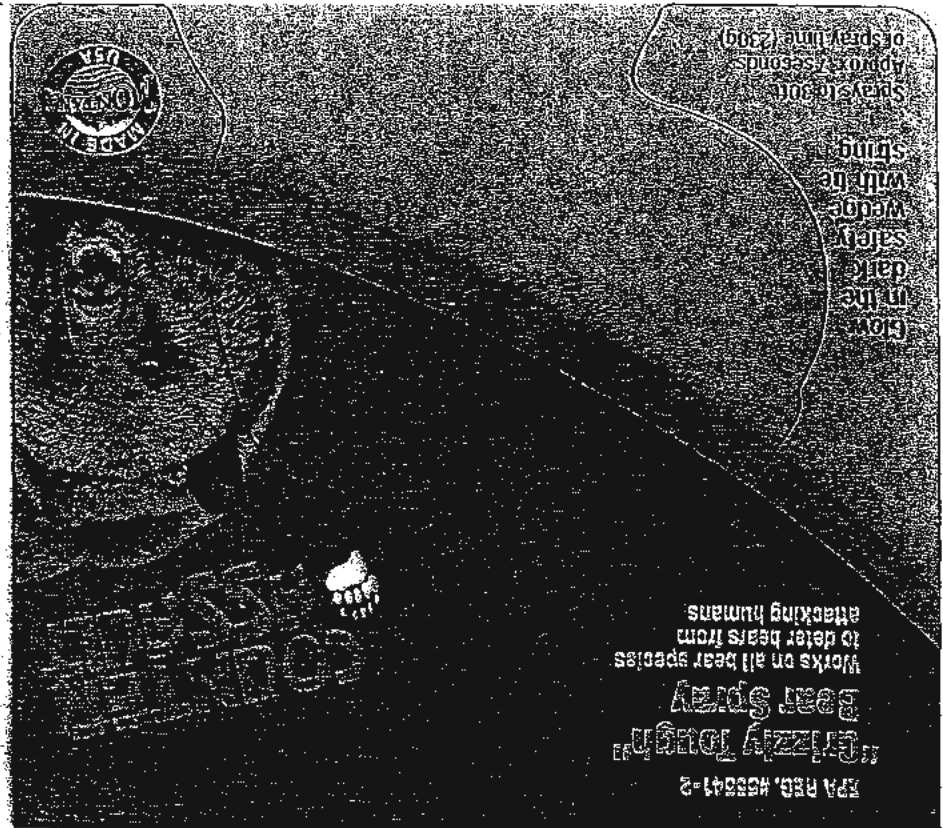
Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12H/sb



7 22031 41425 9



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item # CP12/pb



7 22031 41438 9

NET CONTENTS: 8.1 ounces (230g)

4 of 15
98

Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available; **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®

BEAR DETERRENT

GRIZZLY TOUGH PEPPER SPRAY

MAGNUM 290

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0%
Other Ingredients	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 10.2 ounces (290g)



It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten with food or feed materials which may have become contaminated with this product.

**This product has a range of up to 32 feet (10 meters).
The canister empties in approximately 9 seconds.**

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

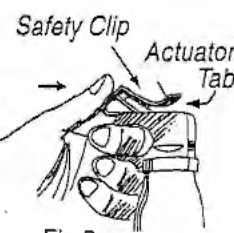
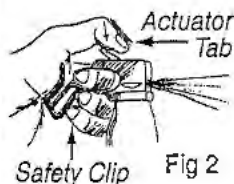
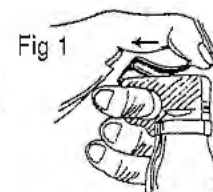


Fig 3

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



COUNTER ASSAULT

Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.
(see reverse)



Follow
in the
club
safety
we're
with
you
strong

Designed to 20 foot @ pressure of spray (blue print)

MAGNUM 290
10.2 ounces
(290g)

Produced by a
Grizzly Bear
Encounter
Survivor!

(see reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product (290g canister) has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Center for Wildlife Information

Black Bear



Grizzly Bear



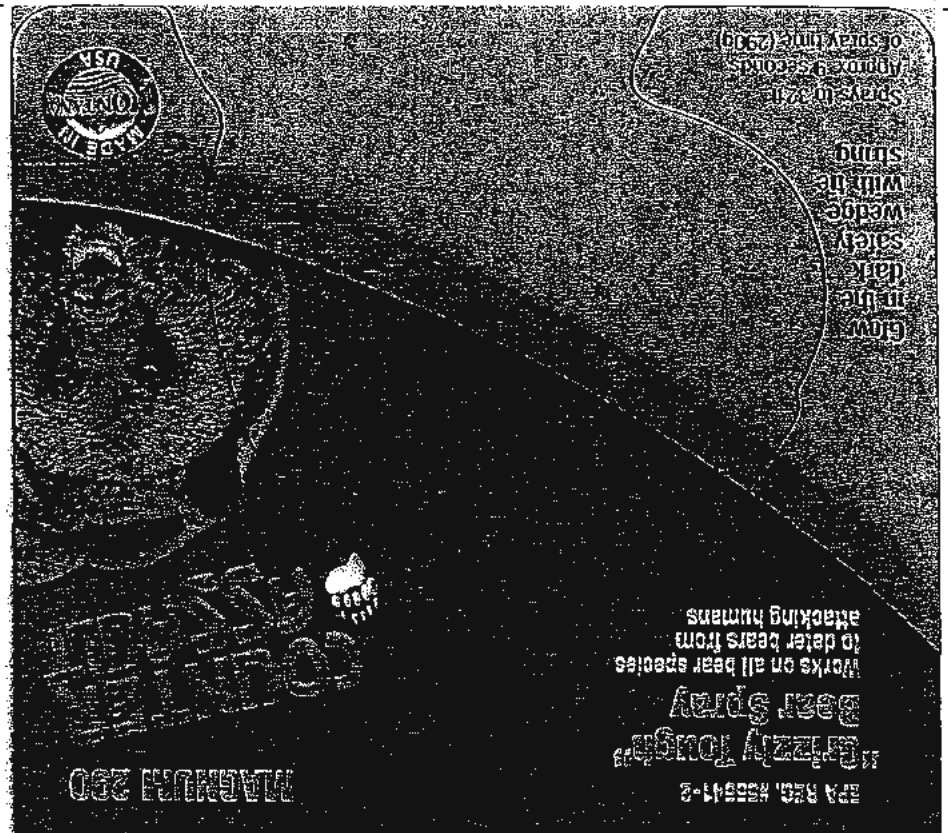
NET CONTENTS:
10.2 ounces (290g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18H/sb





Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

COUNTER ASSAULT

Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18/pb



NET CONTENTS: 10.2 ounces (290g)

8 of 15
102

COUNTER
ASSAULT

**"Grizzly Tough"
Bear Spray
Magnum Value Pack**

EPA REG. #55541-2

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)

Works on all bear
species to deter
bears from
attacking humans



Both include
glow in the
dark safety
wedge with
tie string



Sprays to 30 feet approx. 7 seconds of spray time (230g)

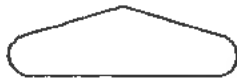
Sprays to 32 feet approx. 6 seconds of spray time (290g)

8.1 ounces
(230g)

MAGNUM 290
10.7 ounces
(290g)

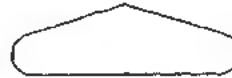


DEVELOPED
IN
CONJUNCTION
WITH THE
UNIVERSITY
OF MONTANA



NET CONTENTS:
10.2 ounces (290g)

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.



NET CONTENTS:
8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

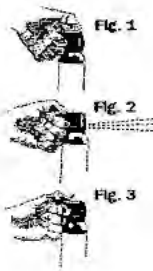
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use is no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:

answers-info@counterassault.com

CHEMICAL EMERGENCY

1-800-535-5053

Manufactured by:

Brushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



Grizzly Bear



Item# CA-12d18H/sb



7 2 2 0 3 1 4 1 4 3 9 6

COUNTER
ASSAULT

**"Grizzly Tough"
Bear Spray
Value Pack**

EPA REG. #55541-2

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)

Works on all bear
species to deter
bears from
attacking humans



Includes
how to
use dark
safety
edge
with
string

Sprays to 30 feet approx. 7 seconds of spray time (230g)

Sprays to 30 feet approx. 7 seconds of spray time (230g)

8.1 ounces
(230g)

8.1 ounces
(230g)



DEVELOPED
IN
CONJUNCTION
WITH THE
UNIVERSITY
OF MONTANA



NET CONTENTS: Combo Pack: TWO - 8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

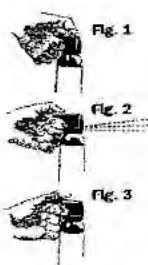
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

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Questions or comments:

answers-info@counterassault.com

CHEMICAL EMERGENCY

1-800-535-5053

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



Grizzly Bear



Item# CA 12"IVP/sb



7 22031414266

1206F 15

107

PROCESSING REQUEST

Reg # 55541-2

Decision # 498925

Description: Fast Track Label Amendment

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

☐ Dated:



Dated: 5/28/15

Only one label type should be selected

Other Materials Sent (see jacket):

☐ New CSF(s) Dated:

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Colin G. Walsh

Division: BPPD

Phone: (703) 308-0298

Date: 05/28/2015



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MAY 28 2015

Bushwacker Backpack & Supply Company dba Counter Assault
c/o Cristina Griffin
Agent
Delta Analytical Corporation
12510 Prosperity Drive
Suite 160
Silver Spring, MD 20904

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Adding new packaging, which combines the 8.1 oz product with an inert trainer canister.
Product Name: Counter Assault Bear Deterrent
EPA Registration Number: 55541-2
Application Date: December 22, 2014
OPP Decision Number: 498925

Dear Ms. Griffin:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

The U.S. Environmental Protection Agency (EPA) notes that you have submitted labeling that includes the sublabel for the inert training canister that contains no active ingredient. As noted in the EPA's Label Review Manual (LRM), Chapter 18, Section IV(A), the EPA has jurisdiction over the packaging and labeling of any "non-pesticide" which is part of the package (refer to 40 CFR 152.3). The EPA has reviewed your inert training canister sublabel and deemed it acceptable; however, the sublabel of your master label that contains this inert training canister label (pages 13-15) will not be part of the FIFRA stamped label. This determination is based on the EPA's LRM, Chapter 19, Section IV(A), which indicates, "The reviewer examines the non-pesticide labeling to determine whether it contains any language that conflicts with the pesticide label, but the reviewer does not actually stamp the non-pesticide label." Although the inert training canister label is not part of the FIFRA stamped label, if you decide to make changes to this label, you must submit it to the EPA for review.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may

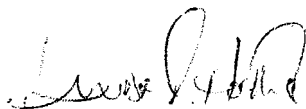
distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Colin G. Walsh of my branch by phone at (703) 308-0298 or via email at walsh.colin@epa.gov.

Sincerely,



Linda A. Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, or the pesticide registered under EPA Reg. No. 55541-2

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY

NOT FOR USE
 ON HUMANS

TO DETER BEARS FROM
 ATTACKING HUMANS



KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0%
Other Ingredients	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
 dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 8.1 ounces (230g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

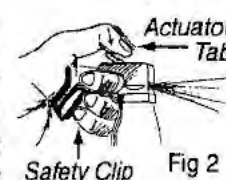
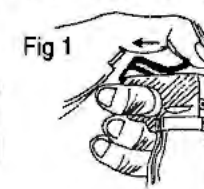
USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

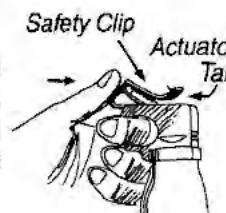
Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).



Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



COUNTER ASSAULT.



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.
(see reverse)



Glow
in the
dark
safety
wedge
with
be
string

Sprays to 30 feet / seconds of spray time (2000)

Produced by a
Grizzly Bear
Encounter
Survivor!

(Story on reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product (230g canister) has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (Fig 1). Depress actuator tab for burst of spray (Fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (Fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Center for Wildlife Information

Black Bear



Grizzly Bear



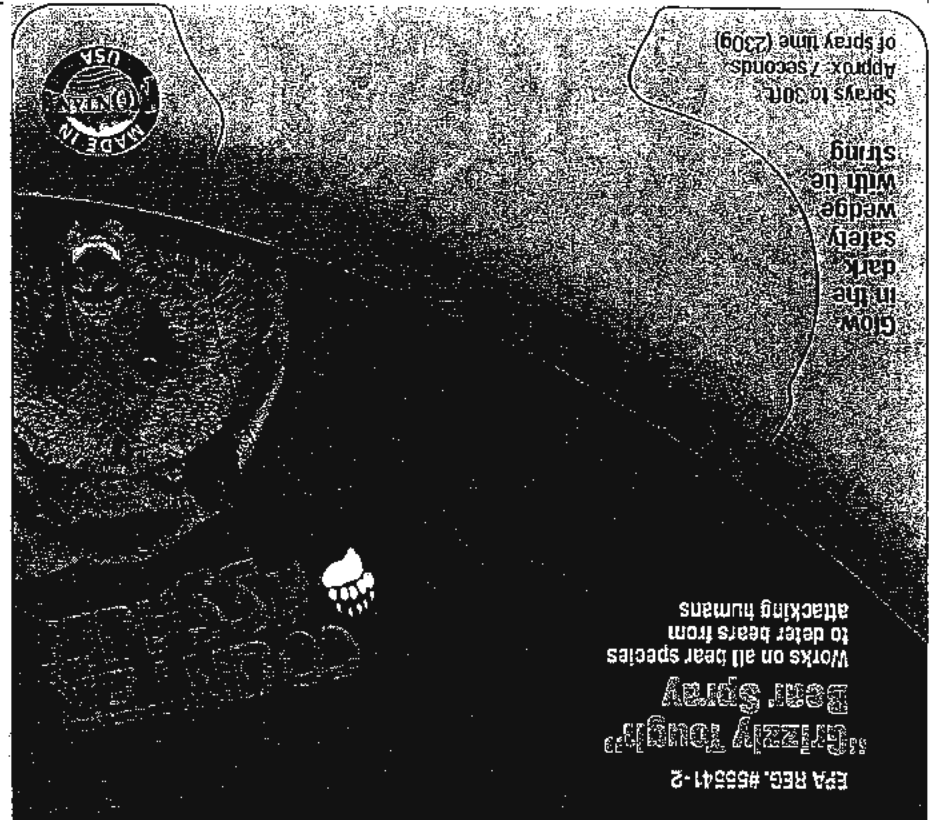
NET CONTENTS:
8.1 ounces (230g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
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dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12H/sb





EPA REG. #66541-2
"Grizzly Tough"
Bear Spray
 Works on all bear species
 to deter bears from
 attacking humans

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
 Bushwacker Backpack and Supply Co., Inc.
 dba COUNTER ASSAULT
 120 Industrial Court, Kalispell, MT 59901
 1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
 1-800-535-5053

Item# CA12/pb



NET CONTENTS: 8.1 ounces (230g)

4 of 15

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** (all your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY
MAGNUM 290

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0%
Other Ingredients	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 10.2 ounces (290g)



DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten with food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters).
The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

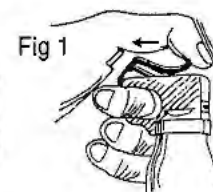


Fig 1

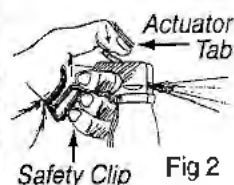


Fig 2

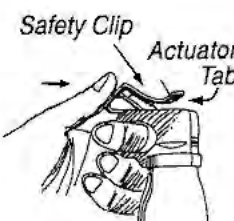


Fig 3

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



COUNTER ASSAULT



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
be
string

Sprays to 22 foot, 9 seconds of spray time (min)

MAGNUM 290
10.2 ounces
(290g)

Produced by a
Grizzly Bear
Encounter
Survivor!

(STOP IT FIRST)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product (290g canister) has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through louching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Center for Wildlife Information

Black Bear



Grizzly Bear



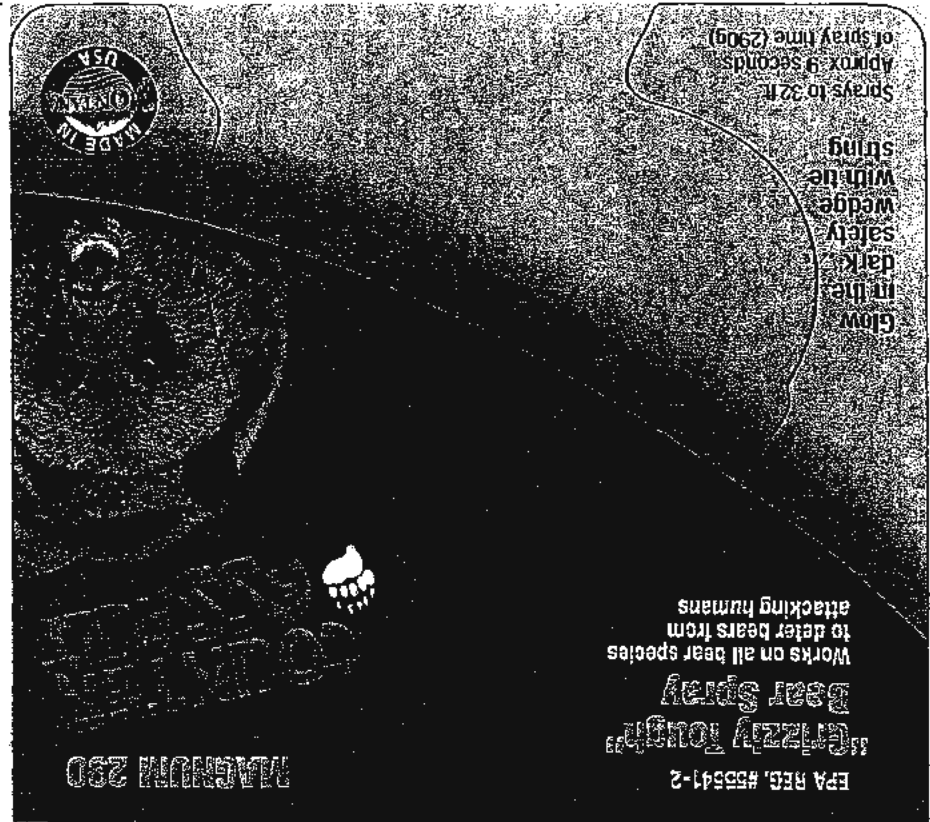
NET CONTENTS:
10.2 ounces (290g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18H/sb





Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18/pb



NET CONTENTS: 10.2 ounces (290g)

8 of 15

COLUMBIAN
RIVER
ASTORIA

"Grizzly Tough" Bear Spray Magnum Value Pack

Works on all bear
species to deter
bears from
attacking humans



Both include
glow in the
dark safety
wedge with
the string

CPA 800L 400001-2

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)



Approx. 10-20 foot, approx. 7 minutes of spray time (250g)

Approx. 10-20 foot, approx. 7 minutes of spray time (250g)

100% COLUMBIAN

(250g)



NET CONTENTS:
10.2 ounces (290g)

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.



NET CONTENTS:
8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

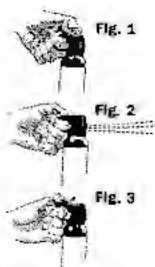
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

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Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



Grizzly Bear



item# CA-12H18H/sb



10 of 15

COLUMBIA
RECORDS

"Grizzly Tough" Bear Spray Value Pack

Works on all bear
species to deter
bears from
attacking humans

EPA REG. NO. 100-100-01

Produced by a
Grizzly Bear
Encounter
Survivor!

(story on reverse)



For best
results,
use in the dark
and/or
at night.

Shrubs to 20 feet, spruce, fir, deciduous of spring time (12/00)

Shrubs to 20 feet, spruce, fir, deciduous of spring time (12/00)





NET CONTENTS: Combo Pack: TWO - 8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

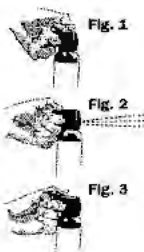
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

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TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

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Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740



Item# CA-12HVP/sb



Walsh, Colin

From: Cristina Griffin <cgriffin@delta-ac.com>
Sent: Wednesday, May 20, 2015 10:20 AM
To: Walsh, Colin
Subject: inert canister amendment for 55541-2
Attachments: 55541-2 Inert Label_2015_Final.pdf

Colin,

Attached is the inert canister label revised in accordance with your comments below. (In enlarging the "Danger" and adding the "Keep out of reach..." we removed the wording that was there, but it was not necessary because it is already in the physical/chemical hazards section anyway.)

Let me know if you need anything else to complete the approval.

Best regards,
Cristina Griffin
Delta Analytical Corporation
e-mail: cgriffin@delta-ac.com
phone: 301 680-7971
fax: 301 680-7975
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

From: Walsh, Colin [mailto:Walsh.Colin@epa.gov]
Sent: Thursday, May 7, 2015 3:29 PM
To: Cristina Griffin
Subject: RE: status of amendment for 55541-2?

Hi Cristina,

First, as you noted below, the label contains an inert training canister combo pack. As noted in the EPA's Label Review Manual (LRM), Chapter 18, Section IV(A), the EPA has jurisdiction over the packaging and labeling of any "non-pesticide" (i.e., the inert training canister) which is part of the package (refer to 40 CFR 152.3). I have completed the review of your inert canister label and note the following deficiencies:

- 1) You do not list several Hazards to Humans and Domestic Animals statements on your inert training label compared to your Bear Repellent label. Although capsaicin may be reason for these additional precautionary statements, the Agency cannot make that determination without acute toxicity data on the inert ingredients alone. Therefore, you should add all of the Hazards to Humans and Domestic Animals statements from the Bear Repellent label to the inert canister label. The Agency also recommends that you add the first aid statement "if on skin or clothing" to the inert canister label as well.
- 2) Add the Keep Out of Reach Of Children statement to your inert canister label.
- 3) Add "Not for use on humans" to your inert canister label.
- 4) Increase the font size of "DANGER".

I would also like to note that the inert training canister label (pages 13-15) will not be part of the FIFRA stamped label that you will receive. This determination is based on the EPA's LRM, Chapter 19, Section IV(A), which indicates, "The reviewer examines the non-pesticide labeling to determine whether it contains any language that conflicts with the pesticide label, but the reviewer does not actually stamp the non-pesticide label." We will still need to review the inert canister label and any future changes to that label, but we will not actually stamp it acceptable under FIFRA.

Please let me know if you have any questions.

Regards,

Colin

Colin G. Walsh, M.S.
Biologist, Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
walsh.colin@epa.gov
(703) 308-0298 (phone)
(703) 305-0118 (fax)
<http://www.epa.gov/pesticides/>

From: Cristina Griffin [<mailto:cgriffin@delta-ac.com>]
Sent: Monday, April 27, 2015 4:25 PM
To: Walsh, Colin
Subject: RE: status of amendment for 55541-2?

Hi Collin,

I just want to point out that this is not the first Bear Spray/Inert training can Combo Pack sent to EPA for approval. UDAP has had one out for a couple of years (see EPA stamped label 5/29/12) and Counter Assault's submission is very similar.

Best regards,
Cristina Griffin
Delta Analytical Corporation
e-mail: cgriffin@delta-ac.com
phone: 301 680-7971
fax: 301 680-7975
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

From: Walsh, Colin [<mailto:Walsh.Colin@epa.gov>]
Sent: Friday, April 24, 2015 3:17 PM
To: Cristina Griffin
Subject: RE: status of amendment for 55541-2?

Hi Cristina,

I have had some discussions with my colleagues about this amendment. We are still working on it. I hope to have something to you in the next couple of weeks.

Regards,

Colin

Colin G. Walsh, M.S.
Biologist, Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)

Office of Pesticide Programs
U.S. Environmental Protection Agency
walsh.colin@epa.gov
(703) 308-0298 (phone)
(703) 305-0118 (fax)
<http://www.epa.gov/pesticides/>

From: Cristina Griffin [<mailto:cgriffin@delta-ac.com>]
Sent: Friday, April 24, 2015 2:57 PM
To: Walsh, Colin
Cc: Debbie Davison
Subject: status of amendment for 55541-2?

Hi Colin,

On December 23, 2014, we submitted a label amendment for Counter Assault Bear Deterrent EPA Reg. No. 55541-2. To date we have not received anything back from EPA, and the approval is not on PPLS. I would appreciate if you would check on it and let me know the status. Thank you for your help.

Best regards,
Cristina Griffin
Delta Analytical Corporation
e-mail: cgriffin@delta-ac.com
phone: 301 680-7971
fax: 301 680-7975
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

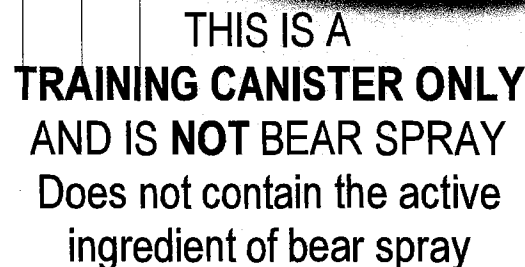
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

Extremely flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where temperature is above 120° F nor below 32° F. Do not store in hot vehicle or direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE!
Non-Refillable Container. Do not reuse or refill this container.
If Empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.



Not for use on Humans

**The Black Canister is NOT Bear
Spray and is for Training
Purposes Only.
The Red Can is Bear Deterrent**

KEEP OUT OF REACH OF CHILDREN

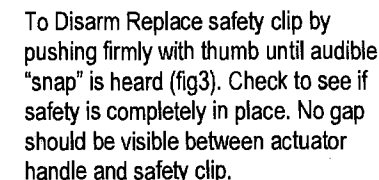
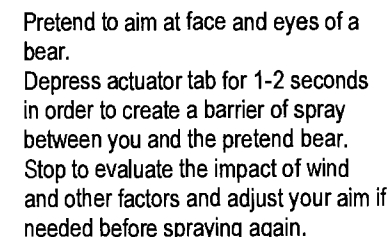
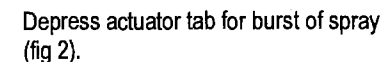
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dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

**NET CONTENTS: 8.1 ounces
(230g)**

INERT TRAINER

This is a training can and you should practice with it until you can perform these activities quickly and accurately.

Designed for one-hand operation.
Place forefinger through hole in handle
with thumb on safety clip curl. With
thumb, pull safety clip straight back
and off (fig 1).



2014-2015
Student: [Name] Email: [Email]
Print Letter
Enter More Information
Tracking
22-Oct-2014 24-Oct-2014
25-Oct-2014 30-Oct-2014
View/Edit

Colon

5

Fee for Service

{962191&~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☒ BPPD

☐ RD

Risk Mgr. 91

Receipt No.

S- 962191

EPA File Symbol/Reg. No.

55541-2

Pin-Punch Date:

12/24/2014

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ ____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Andrew Byrdland

Date: 12-29-14

Remarks:

Assign to Colon



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 30, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

KIRSTEN K. JOHNSON
BUSHWACKER BACKPACK & SUPPLY CO.
D/B/A COUNTER ASSAULT
120 INDUSTRIAL COURT
KALISPELL, MT 59901

PRODUCT NAME: COUNTER ASSAULT BEAR DETERRENT
COMPANY NAME: BUSHWACKER BACKPACK & SUPPLY CO.
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 55541-2
EPA RECEIPT DATE: 12/24/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Biologicals & Pollution Prevention Division, PM Team 91, at (703) 305-6928.

Sincerely,

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



December 22, 2014

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Linda Hollis (BPPD)

Re: Application for minor label amendment, no PRIA fee
Product: Counter Assault Bear Deterrent
EPA Reg. No.: 55541-2
Company: Bushwacker Backpack and Supply Company, DBA Counter Assault

Dear Ms. Hollis:

On behalf of Bushwacker Backpack and Supply Company, DBA Counter Assault, we are submitting a minor label amendment for the product Counter Assault Bear Deterrent, EPA Reg. No. 55541-2.

We are adding new packaging combining the EPA approved 8.1 oz. product along with a non pesticidal "inert trainer" 8.1 oz. product. The inert trainer canister does not include the active ingredient. With the exception of the active ingredient, the rest of the formulation is identical to the Counter Assault Bear Deterrent. The inert trainer is for training and trial purposes **only**, and this is clearly indicated on the label.

The only changes are on pages 13 through 15, but we have included the current approved label to ensure completeness in EPA's database. The revised pages are tabbed for your convenience. **There are no other changes to the label that EPA approved on 11/06/14.**

Enclosures:

- EPA form 8570-1
- One copy of the revised label (changes highlighted)

If you have questions, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely,

Cristina Griffin
Agent for Bushwacker Backpack & Supply Company DBA Counter Assault

cc: Pride Johnson, Counter Assault



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

AMEND**Application for Pesticide - Section I**

1. Company/Product Number 55541-2	2. EPA Product Manager Linda Hollis, Branch Chief	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bushwacker Backpack and Supply Company, DBA Counter Assault /Counter Assault Bear Deterrent	PM# Biopesticides and Pollution Prevention Division (BPPD)	
5. Name and Address of Applicant (Include ZIP Code) Bushwacker Backpack & Supply Company DBA Counter Assault c/o Delta Analytical Corp. 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated <input type="checkbox"/> Notification - Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - explain below
--	---

Explanation: Use additional page(s) if necessary. (For section I and Section II.)**Application for minor label amendment, no PRIA fee****Section - III**

1. Material this Product will be Packaged in:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted.		If "Yes," Unit Package wgt. No. per container	If "Yes," Unit Package wgt. No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container	5. Location of Label Direction <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner In Which Label Is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Cristina Griffin	Title Agent for Counter Assault	Telephone No. (Include Area Code) 301-680-7971

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Agent for Counter Assault	6. Date Application Received (Stamped)
4. Typed Name Cristina Griffin	5. Date December 22, 2014	

with the polyvinyl alcohol films. In order to accommodate this desirable method of packaging, the Agency has accepted other labeling approaches. See *PR Notice 94-8* for complete information.

The most widely used packaging is a tear-open foil envelope containing each soluble packet; the foil envelope bears the required labeling. This foil envelope method has the added benefit of protecting the soluble packet from moisture which could cause shelf-life problems. Another acceptable method is a muffin-pan type of package where each packet is enclosed in a depression with a tear-off top that seals each chamber. The tear-off top bears the required labeling.

A vital consideration in dealing with soluble packets is how to reduce the likelihood of the user removing unlabeled packets from labeled containers long before use and then forgetting what they are. Because laundry detergents and dry bleaches are also manufactured in soluble packets, there is the possibility that pesticides could be mistaken as these products. The Agency believes that simply packaging a quantity of unlabeled soluble packets in an outer container where they could be easily separated from the accompanying labeling does not meet the FIFRA registration standard. Each packet must either bear identifying labeling on the film itself (where feasible) or on packaging immediately enclosing that packet. *PR Notice 94-8* describes in more detail the concerns the Agency has with pesticide products containing water-soluble packaging (See *Chapter 10* for reduced Personal Protective Equipment for water-soluble packaging products subject to the Worker Protection Standard.)

IV. Multi-packs/co-packs

A. Registered Pesticide Packaged with a Non-Pesticide

A registered pesticide product, in one container, may be packaged with a non-pesticide component, such as an adjuvant, in a separate container (which is to be added to the pesticide during mixing). These two containers, combined in one package, may be sold as a single unit only if the adjuvant is referred to in the Directions for Use on the label.

The two containers are distributed and sold as a single retail unit, and together comprise the pesticide product. (See *40 CFR 152.3* and *FIFRA 2(u)* defining pesticide to include a "mixture of substances"). If the two components are bound together with a shrink-wrap sleeve or in a box, the full label of the pesticidal component must be visible through the wrapping, or the label must be duplicated and attached to, or printed on, the outermost container.

The regulation at *40 CFR 152.3* states that the "pesticide product" includes the package intended to be distributed or sold. EPA has jurisdiction over the packaging and labeling of any "non-pesticide" which is part of the package. This means that the Agency reviews and accepts or disapproves of the non-pesticide that is packaged with the pesticide. The reviewer

examines the non-pesticide labeling to determine whether it contains any language that conflicts with the pesticide label, but the reviewer does not actually stamp the non-pesticide label. An example of such a non-pesticide would be an activator (such as potassium permanganate) which accompanies a pesticide (sodium bromide). EPA reviews the labels for both products, but stamps only the accepted pesticide label, noting any problems or changes needed for the non-pesticide label.

B. Two or More Pesticides Packaged Together

Two or more pesticide products may be packaged in separate containers but sold together as a single unit. The user may be instructed on the label to tank mix the products that were packaged together just before application. (*FIFRA 2(ii)*)

Each container must bear, or be accompanied by, full labeling, and the full labels of both containers must be visible. If the outermost packaging obscures any part of the labeling of the pesticides, the full labels must be duplicated and attached to the outermost container. (*40 CFR 156.10(a)(4)(i)*)

Approaches regarding the labeling for multi-packs and co-packs are dependent on the specific issues of each case. Registrants should contact the appropriate division for additional information before submitting registrations or amendments that feature multi-packs or co-packs or before deciding whether such packaging requires registration.

V. Small containers

Some containers are too small to contain all required label text. In such cases, it is permissible to have text located on accompanying pamphlets or other collateral material, all of which are considered product labeling. The Agency historically has required certain information to appear on the label of small containers:

- ▶ ingredient statement
- ▶ signal word
- ▶ skull and crossbones (when required)
- ▶ child hazard warning
- ▶ EPA Registration Number
- ▶ EPA Establishment Number
- ▶ the phrase "RESTRICTED USE PESTICIDE" (if so classified)
- ▶ a reference statement to any accompanying pamphlets.

13. Multiple Products Packaged Together

- **Is it legal for a veterinary clinic to sell an individual dose of an EPA-regulated topical flea/tick product, i.e., break up a 3- or 6-pack and sell individual doses? If it is legal are there specific guidelines? LC11-0483; 12/19/11**

Normally, it would be a violation of FIFRA to break up a registered pesticide product and sell and distribute individual doses. However, on November 1, 1979, EPA published a notice of an enforcement policy in the Federal Register entitled "Pesticide Use and Production by Veterinarians; Statement of Policy on the Applicability of the Federal Insecticide, Fungicide, and Rodenticide Act to Veterinarians" (44 FR 62940) (4 pp, 2 MB, [About PDF](#)). This policy provides that veterinarians may dispense pesticides for treatment provided certain minimal conditions described in the notice are met. The conditions are paraphrased below, for full details see the policy statement:

- 1) The pesticide to be repackaged is registered for a use consistent with the use for which it is prescribed and the use may not be a restricted use;
- 2) The veterinarian supplies the client with labeling for the pesticide that contains the common or trade name and percentage(s) of the active ingredient(s), the EPA product registration number, the use directions for the use prescribed, the name and address of the veterinarian, an antidote statement, directions for disposal of the pesticide and the package dispensed to the client, and human safety precautionary statements (including, but not limited to "for application to animals only," "keep out of reach of children," "in case of accident, contact local physician immediately");
- 3) The container is a child-resistant package; and
- 4) The pesticide is prescribed and dispensed to the client for the treatment of a specific pest problem, on a case-by-case basis, as part of the veterinarian's normal practice.

Provided the conditions listed in the notice are met, a veterinarian may break up a 3- or 6-pack and sell individual doses. Further, EPA urges veterinarians to discuss the labeling directions with the client at the time the pesticide is dispensed.

- **A pesticide is sold as 10 1-fl-oz bottles in a box. A do-it-yourself pest store is selling the individual 1-oz bottles which do not have the full label. If they copy the full label and sell it with the bottle is this a violation? (LC09-0285; 7/21/09)**

Unless the EPA registration allows and the registrant has authorized the do-it-yourself pest store to sell the bottles individually and to copy the label and provide it to the customer, the act of copying the label and providing it to the customer along with the individual bottle is considered production and sale of an unregistered pesticide. If the registrant authorizes the do-it-yourself pest store to open a box and sell individual bottles along with a copy of the full label and such sale is permitted under the registration, the do-it-yourself store would have to register as a producing establishment and file annual reports of their production. In addition, the individual bottles, if sold separately without the full labeling, are considered misbranded and it is

a violation of section 12(a)(1)(F) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) to sell or distribute a misbranded pesticide.

- **“Kits” that contain multiple products. These kits often contain one or more FIFRA-regulated products, along with, in some cases, one or more non-FIFRA products. Each product in the kit is separately packaged and labeled – just as it would be if sold separately. The kit consists of an outer container, such as cardboard box, which houses the separately-packaged FIFRA and non-FIFRA products placed inside the outer container. (LC07-0106; 10/29/07)**

Question 1. Does EPA want to review each kit label, even in cases where the label simply reprints the EPA-approved label language for each individual FIFRA product in the kit?

If the approved label(s) is visible through the outer packaging (e.g. visible through shrink-wrap), or if the outer packaging is an exact replica of the approved label(s), EPA does not need to review the kit label. If, however, the kit is sold under a separate name from its previously registered contents, the kit must be registered as a separate product and the kit label must be reviewed. 40 CFR 152.5 defines “pesticide product” as “a pesticide in the particular form (including composition, packaging, and labeling) in which the pesticide is, or is intended to be, distributed or sold.” 40 CFR 156.10(b)(2)(ii) requires pesticide products to have unique names. Therefore if the kit is considered anything more than the combination of separately named products (i.e., when the kit is marketed with its own distinct name), the kit must be registered.

Thus if the kit is being sold as a unique product requiring separate registration or the individual product labels are not visible from the outer container or the previously approved labels are not used on the outer container in their entirety without modification, EPA must review the labeling through the registration (in the case of a new product) or registration amendment process. The Agency may allow, if appropriate, a subset of the approved label to appear on the outer container. In all cases, the following items are required to be fully visible either through the outer packaging or on the outer container: 1. Product Name, 2. Registration Number, 3. Ingredient Statement, 4. Signal Word, 5. Keep out of reach of children statement, 6. Precautionary Statements, 7. The full directions for use or a referral statement to read the labels on the containers in the box for full directions for use, including mixing or sequential use of the products, 8. Name and address of producer or registrant, 9. Net weight, 10. If highly toxic, skull and crossbones, “poison,” and a statement of practical treatment in case of poisoning, 11. Use classification (e.g. Restricted use), 12. Establishment Registration

Question 2. If so, should the company submit the kit label to the team for each pesticide contained in the kit, so that the label can be included in the registration jacket for each pesticide in the kit?

If review is necessary and multiple pesticide products are contained within the kit, the outer container label must be reviewed by the particular team for each individual pesticide product contained inside. To help coordinate this review, it would be helpful to include a cover letter identifying the teams that will be reviewing the outer container label.>

Question 3. Please advise as to the appropriate method for submission. For

example, should the submission be made by means of notification or registration amendment? Also, how should the submission be marked, so as to provide the reviewer a specific reference (e.g., regulation or PR Notice) for the submission.

If label review is necessary, the amended label must be submitted as a registration amendment. If no label review is necessary because approved labeling is visible either through the outer packaging or reprinted in total and the packaging changes meet the criteria found in PR 98-10 II.E., the change can be made through notification.

Question 4. As noted above, in some instances the kit will contain one or more FIFRA-products and one or more non-FIFRA products. Does EPA also want to review the label for such “mixed” product kits?

EPA has the responsibility to ensure that pesticide labeling – written, printed, or graphic matter accompanying the pesticide at any time – is not false or misleading before it is approved. See FIFRA §§ 3(c)(3)(5), 2(p)(2)(A). To that end, EPA will review labels for kits that contain both FIFRA and non-FIFRA products. Where non-FIFRA labeling is printed on the outer container, the labeling must be reviewed because the non-FIFRA labeling would not have been previously approved by EPA. EPA will review the pesticide portion of the label and relevant parts of the non-pesticide label (for instance, use of language that may interfere with the proper use of the pesticide). The non-pesticide component will not be stamped approved by EPA.

INERT TRAINER

DIRECTIONS TO BE USED FOR TRAINING CANISTER ONLY

PHYSICAL HAZARDS

EXTREMELY FLAMMABLE: This is a non-refillable container. It is extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate. Exposure to temperatures above 130°F may cause bursting.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS.

Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Press valve to release all pressure then place in trash or offer for recycling.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.



**THIS IS A
TRAINING CANISTER
ONLY
AND IS NOT BEAR SPRAY
Does not contain the active
ingredient of bear spray**

The Black Canister is NOT Bear
Spray and is for Training
Purposes Only.
The Red Can is Bear Deterrent

DANGER

Extremely Flammable
Contents under pressure
Read carefully cautions on side panel.

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

**NET CONTENTS: 8.1 ounces
(230g)**

INERT TRAINER

DIRECTIONS FOR USE

The canister is designed to be used as a training tool. It is not intended to be used as a bear deterrent. Counter Assault Bear Deterrent is sold separately.

APPLICATION DIRECTIONS: Spraying procedure should be followed to arm the canister, apply the product and restore the safety clip to disarm the container. Before taking bear spray into bear country, read the directions below and familiarize yourself with these procedures. Contents include food grade oils which may attract bears if used in a camping area. Practice prior to entering bear country.

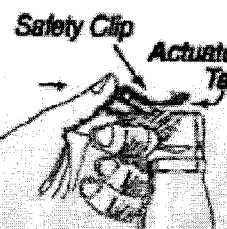
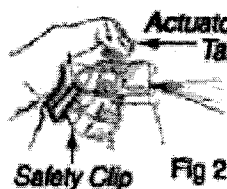
This is a training can and you should practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation.
Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Pretend to aim at face and eyes of a bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the pretend bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



**COUNTER
CHARGE**

"Grizzly Tough" Bear Spray & Inert Training Can

Produced by a
Grizzly Bear
Encounter
Survivor!
(story on reverse)



Use in the
dark!
Only
works
at night!

Sprays to 30 feet, approx. 7 seconds of spray time (10%)



When you're
sprayed, you
can't see the
bear's face
anymore!

When you're
sprayed, you
can't see the
bear's face
anymore!

When you're
sprayed, you
can't see the
bear's face
anymore!

When you're
sprayed, you
can't see the
bear's face
anymore!



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault. Pride Johnson,

President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

INERT TRAINING CAN

DIRECTIONS FOR USE:

This product is **NOT** to be used as a bear deterrent.

The canister empties in approx. 7 seconds and sprays approx. 30 ft, similar to the spray time and distance of Counter Assault Bear Deterrent at 70° F.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking bear spray into bear country, read the directions below and familiarize yourself with these procedures. Contents include food grade oils which may attract bears if used in a camping area. Practice prior to entering bear country.

This is a training can and you should practice with it until you can perform the described activities quickly and accurately.

TO ARM & APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb placed over the curl, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Pretend to aim at face and eyes of a bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the pretend bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Black Bear



Grizzly Bear



NET CONTENTS:
8.1 ounces (230g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Buschacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

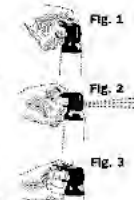
BEAR SPRAY CAN

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.



TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F.

Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Item# CA-12H/I-12B/sb



Receipt for Section 3

S: 300511 Milestone Email: [Redacted]

Regulatory Type: Product Registration - Section 3
Application Type: Miscellaneous Receipt
Category: 15741 BUSHWACKER BACKPACK & SUPPLY CO

Regulation: Yes No
Fee For Service: Yes No
Dilute: Yes No

Print Label
Enter More Information
Tracking

Risk Manager: Biological & Pollution Prevention Division, RPM Team 91

Product #: 155412 Product Name: COUNTER ASSAULT BEAK DETERRENT

Quantity: [Redacted]

Me Top Section2 Me Top Product Name

Application Date: 12-Nov-2014 OPP Rec'd Date: 13-Nov-2014
Front End Date: 13-Nov-2014 Risk Manager Sent Date: 17-Nov-2014
FES Due Date: [Redacted] Registered Due Date: [Redacted]
OPP Target Date: [Redacted]

Fast Track: [Redacted] New Ingredient: [Redacted]

Receipt Description: [Redacted]

FPL per 15/14 agency letter [Redacted]

Form A: [Redacted] Signature Date: [Redacted] Form B: [Redacted] Signature Date: [Redacted]

New Ingredient Request Date: [Redacted]
New Ingredient Request Date: [Redacted]

Receipt Content: [Redacted] Paper Label: [Redacted]
View/Edit

Colin



November 12, 2014

Document Processing Desk (FINAL)
Office of Pesticide Programs (7504P)
Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Linda Hollis, Branch Chief, Biochemical Pesticides Branch, Biopesticides and Pollution
Prevention Division (BPPD) (7511P)

Re: Final Label submission requested by EPA in letter dated 11/6/14
Product: Counter Assault Bear Deterrent
EPA Reg. No.: 55541-2
Company: Bushwacker Backpack and Supply Company, DBA Counter Assault

Dear Ms. Hollis:

On behalf of Bushwacker Backpack and Supply Company, DBA Counter Assault (Counter Assault), we are submitting the final label for the product Counter Assault Bear Deterrent, EPA Reg. No. 55541-2. In the EPA approval letter dated 11/6/14, we were asked to submit two copies of the final label; no changes to the label were requested.

Enclosures

- EPA form 8570-1
- 2 copies of final label
- EPA approval letter of 11/6/14

If you have any questions regarding this submission, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Cristina Griffin".

Cristina Griffin
Agent for Bushwacker Backpack & Supply Company DBA Counter Assault

cc: Pride Johnson, Counter Assault
George Hyde, Counter Assault



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

FINAL**Application for Pesticide - Section I**1. Company/Product Number **55541-2**2. EPA Product Manager
Linda Hollis, Branch Chief,

3. Proposed Classification

☐ None ☐ Restricted4. Company/Product (Name) **Bushwacker Backpack and Supply Company, DBA Counter Assault /Counter Assault Bear Deterrent**PM# **Biopesticides and Pollution Prevention Division (BPPD)**5. Name and Address of Applicant (Include ZIP Code)
**Bushwacker Backpack & Supply Company DBA Counter Assault c/o Delta Analytical Corp.
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904**☐ Check if this is a new address6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

☐ Amendment - Explain below
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.

☒ Final printed labels in response to Agency letter dated **11/6/14**☐ "Me Too" Application.☐ Other - explain below.**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)**Final Label submission requested by EPA in letter dated 11/6/14.**

**Complies with
EPA Accepted Labeling
DEC 01 2014**

Date: _____

Section - III**1. Material this Product will be Packaged in:**Reviewer: C. WalshChild-Resistant Packaging
☐ Yes*
☐ NoUnit Packaging
☐ Yes
☐ NoWater Soluble Packaging
☐ Yes
☐ No

2. Type of Container

☐ Metal
☐ Plastic
☐ Glass
☐ Paper
☐ Other (Specify) _____

*** Certification must be submitted.**If "Yes,"
Unit Package wgt. No. per containerIf "Yes,"
Unit Package wgt. No. per container

3. Location of Net Contents Information

☐ Label ☐ Container

4. Size(s) of Retail Container

5. Location of Label Direction

☐ On Label
☐ On Labeling accompanying product

6. Manner In Which Label Is Affixed to Product

☐ Lithograph
☐ Paper glued
☐ Stenciled

☐ Other _____**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name
Cristina GriffinTitle
Agent for Counter AssaultTelephone No. (Include Area Code)
301-680-7371**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title
Agent for Counter Assault4. Typed Name
Cristina Griffin5. Date
November 12, 2014

6. Date Application Received

(Stamped)

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Complies with
EPA Accepted Labeling
 Date: DEC 01 2014
 Reviewer: C. Wash
COUNTER ASSAULT®
BEAR DETERRENT
 GRIZZLY TOUGH PEPPER SPRAY

NOT FOR USE
 ON HUMANS

TO DETER BEARS FROM
 ATTACKING HUMANS



KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids*	2.0%
Other Ingredients	98.0%
TOTAL	100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.

dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 8.1 ounces (230g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

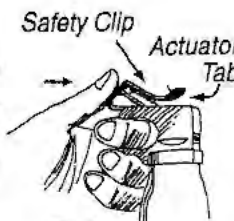
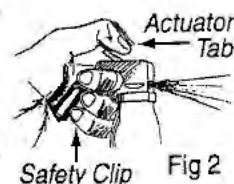
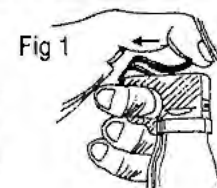


Fig 3

UFA REG. #155541-2

DEVELOPED IN CONJUNCTION
WITH THE UNIVERSITY OF MONTANA

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



COUNTER ASSAULT.



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
the
string

Shrugs to 30 inch 2 seconds of spray time (2000)

Produced by a
Grizzly Bear
Encounter
Survivor!

(story on reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product (230g canister) has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause burning.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

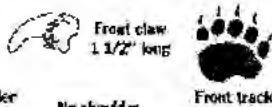
DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Center for Wildlife Information

Black Bear



Straight face profile



Grizzly Bear



Dish face profile



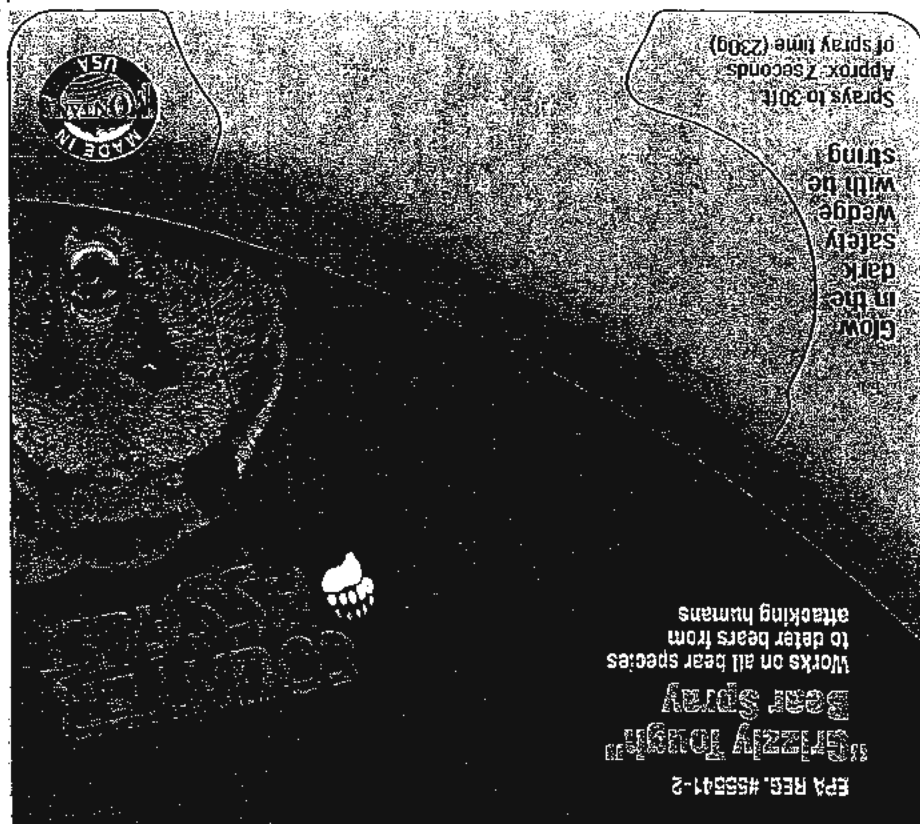
NET CONTENTS:
8.1 ounces (230g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12H/sb





Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item # CA12/pb



NET CONTENTS: 8.1 ounces (230g)

4 of 12

147

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY
MAGNUM 290

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids* 2.0%

Other Ingredients 98.0%

TOTAL 100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.

dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 10.2 ounces (290g)



DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten with food or feed materials which may have become contaminated with this product.

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

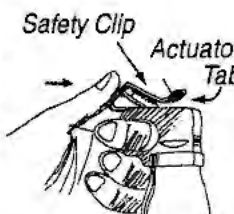
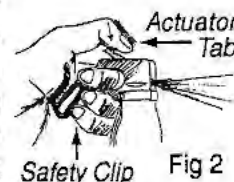
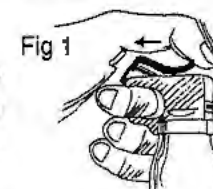


Fig 3

EPA REG. #33541-2

DEVELOPED IN CONJUNCTION
WITH THE UNIVERSITY OF MONTANA

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



COUNTER ASSAULT



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
the
string

Sprays to 32 feet 8 seconds of spray time (trial)

MAGNUM 290
10.2 ounces
(290g)

Produced by a
Grizzly Bear
Encounter
Survivor!

(slowly reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product (290g canister) has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Center for Wildlife Information

Black Bear



Grizzly Bear



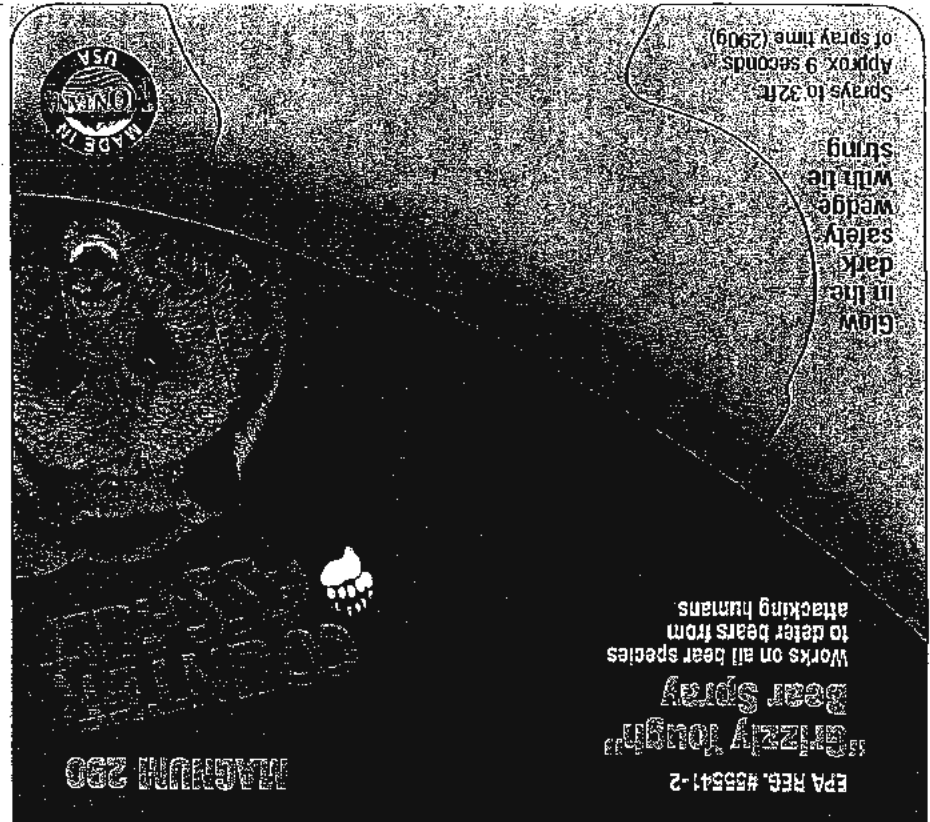
NET CONTENTS:
10.2 ounces (290g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18H/sb





Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Net Wt. 10.2 oz/pb



7 22031 41448 8

NET CONTENTS: 10.2 ounces (290g)

8 of 12

**COUNTER
ASSAULT**

"Grizzly Tough" Bear Spray Magnum Value Pack

EPH. REG. #000001-2
**Produced by a
Grizzly Bear
Encounter
Survivor!**
(story on reverse)

Works on all bear
species to deter
bears from
attacking humans



Both include
glow in the
dark safety
wedge with
the string



Spray to 25 foot distance, 2 minutes of spray time (200g)

Spray to 25 foot distance, 2 minutes of spray time (200g)

3.1 ounces
(200g)

MAGNUM 250
16.7 ounces
(200g)



GRIZZLY BEAR
ENCOUNTER
SURVIVOR
PRODUCT



NET CONTENTS:
10.2 ounces (290g)

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

NET CONTENTS:
8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

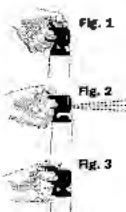
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

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TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

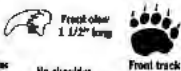
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Questions or comments:
answers-info@counterassault.com

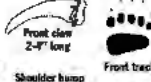
CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kallispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



Grizzly Bear



Item# CA-12H18H/sb



10 of 12

**COUNTER
ATTACK**

"Grizzly Tough" Bear Spray Value Pack

Works on all bear
species to deter
bears from
attacking humans

EPA REG. NUMBER 2

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)



Resistant
to rain in
the dark
waterproof
material
with
the ability

Strong to 20 inch supports, 2 inch thick of spray from 12 inch

Strong to 20 inch supports, 2 inch thick of spray from 12 inch



REGISTERED
IN
THE UNITED STATES
OF AMERICA



NET CONTENTS:
Combo Pack: TWO - 8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

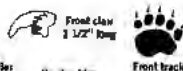
Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

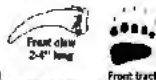
Black Bear



Straight face profile



Grizzly Bear



Dished face profile



Item# CA-12HVP/sb



12 of 12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 6, 2014

Bushwacker Backpack and Supply Company dba Counter Assault
c/o Cristina Griffin
Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Subject: Application for Label Notification to make minor labeling revisions for adding new packaging that combines the approved 8.1 ounce and 10.2 ounce products.
Product Name: Counter Assault Bear Deterrent
EPA Reg. No.: 55541-2
Your submission dated September 29, 2014
Decision Number: 495919

Dear Ms. Griffin:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under PR Notice 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PR Notice 98-10 and it has been determined that the action requested falls within the scope of PR Notice 98-10. Our records have been duly noted and the label submitted with the application has been stamped "Notification Accepted" and will be placed accordingly in our records.

Two (2) copies of final printed labeling must also be submitted to the Agency before your product, as modified, may be sold or distributed [PR Notice 82-2 and 40 CFR 156.10(a)(6)]

If you have any questions concerning this action, please feel free to contact Mr. Colin Walsh at (703) 308-0298 or via email at walsh.colin@epa.gov.

Sincerely,

Linda A. Hollis

Linda A. Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention
Division (7511P)

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Notification Accepted

Date: NOV 06 2014

Reviewer:

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids* 2.0%

Other Ingredients 98.0%

TOTAL 100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.

dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 8.1 ounces (230g)

EPA Registration #55541-2

EPA Est No: 055541-MT-001



DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

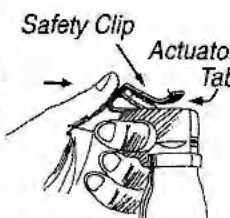
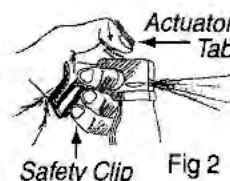
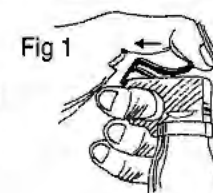


Fig 3

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



COUNTER ASSAULT



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.
(see reverse)



Glow
in the
dark
safety
wedge
with
tie
string

Sprays to 30 feet; 7 seconds of spray time (200)



Produced by a
Grizzly Bear
Encounter
Survivor!

(story on reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product (230g canister) has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eye of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Center for Wildlife Information

Black Bear



Grizzly Bear



NET CONTENTS:
8.1 ounces (230g)

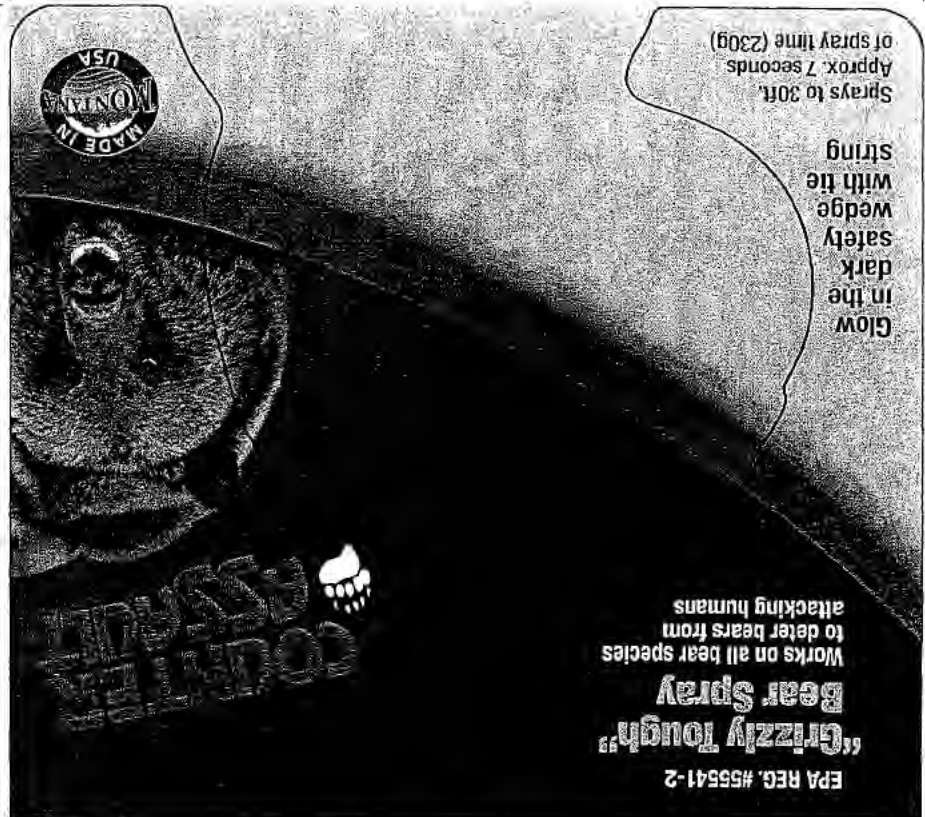
Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12H/sb



15B of 12



Sprays to 30ft.
Approx. 7 seconds
of spray time (230g)

Glow
in the
dark
safety
wedge
with tie
string

EPA REG. #55541-2
"Grizzly Tough"
Bear Spray
Works on all bear species
to deter bears from
attacking humans

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

Questions or comments: answers info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA12/pb



NET CONTENTS: 8.1 ounces (230g)

4 of 12

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER:

May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS:

Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container.

If empty: Press valve to release all pressure then place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

COUNTER ASSAULT®
BEAR DETERRENT
GRIZZLY TOUGH PEPPER SPRAY
MAGNUM 290

NOT FOR USE
ON HUMANS

TO DETER BEARS FROM
ATTACKING HUMANS

KEEP OUT OF REACH OF CHILDREN
DANGER

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK DETERRENT WHICH MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED. SEE SIDE PANELS FOR FIRST AID AND PRECAUTIONARY STATEMENTS.

Active Ingredient:

Capsaicin and related capsaicinoids* 2.0%

Other Ingredients 98.0%

TOTAL 100.0%

*Derived from Oleoresin of Capsicum

Manufactured by:

Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT

120 Industrial Court, Kalispell, MT 59901

1-800-695-3394 • (406) 257-4740

CHEMICAL EMERGENCY: 1-800-535-5053

NET CONTENTS: 10.2 ounces (290g)



DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten with food or feed materials which may have become contaminated with this product.

**This product has a range of up to 32 feet (10 meters).
The canister empties in approximately 9 seconds.**

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform these activities quickly and accurately.

To Arm and Apply

Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1).

Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm

Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

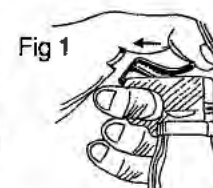


Fig 1

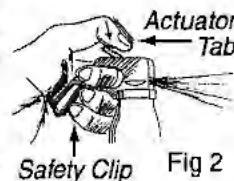


Fig 2

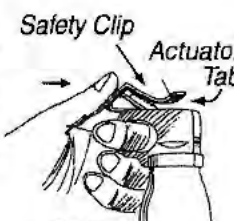


Fig 3

EPA REG. #55541-2

DEVELOPED IN COLLABORATION
WITH THE UNIVERSITY OF MONTANA

"Grizzly Tough" Bear Spray

Works on all bear
species to deter
bears from
attacking
humans



COUNTER ASSAULT



Developer of high
emission "atomized"
fire extinguisher-style
spray used in bear
deterrents.

(see reverse)



Glow
in the
dark
safety
wedge
with
Ee
string

Sprays to 32 feet @ seconds of spray time (approx)



MAGNUM 290
10.2 ounces
(290g)

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)



Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

This product (290g canister) has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE & DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight.

DISPOSAL: DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Center for Wildlife Information

Black Bear



Grizzly Bear



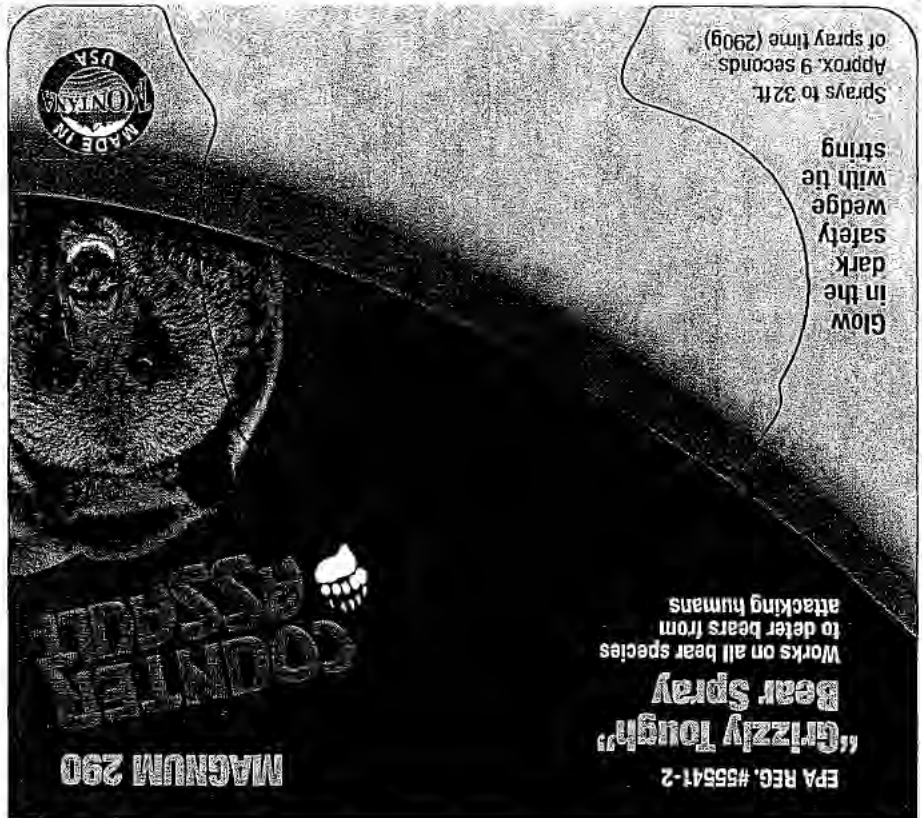
NET CONTENTS:
10.2 ounces (290g)

Questions or comments:
answers-info@counterassault.com

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740
CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18H/sb





Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter Assault.

Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.



Counter Assault Bear Deterrent:

- Developed in conjunction with the University of Montana
- Developer of high emission "Atomized" fire extinguisher-style spray used in bear deterrents

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Questions or comments: answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Item# CA18/pb



NET CONTENTS: 10.2 ounces (290g)

8 of 12

COUNTER
ASSAULT

"Grizzly Tough" Bear Spray Magnum Value Pack

Works on all bear
species to deter
bears from
attacking humans



Both include
glow in the
dark safety
wedge with
the string

CPA 900L #00040-02

Produced by a
Grizzly Bear
Encounter
Survivor!

(story on reverse)



Sprays to 30 feet, repels, 7 seconds of spray time (7-10 ft)

Sprays to 30 feet, repels, 7 seconds of spray time (7-10 ft)

2.1 ounces
(2.3oz)

MAGNUM 290
10.7 ounces
(290g)



GRIZZLY BEAR
ENCOUNTER
SURVIVOR
SUPPORT FUND
UNIVERSITY
OF ALABAMA

NET CONTENTS:
10.2 ounces (290g)

This product has a range of up to 32 feet (10 meters). The canister empties in approximately 9 seconds.



NET CONTENTS:
8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

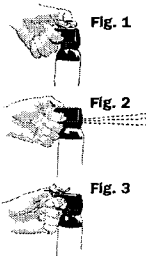
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used only to deter bears which are attacking or appear likely to attack humans. Do not spray this product on objects, tents, or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials which may have become contaminated with this product.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you test-fire this container, make sure the wind is at your back and depress actuator tab for no more than half a second. Do not test-fire in area inhabited by bears. If test-fired, clean nozzle and can with soap and water to remove residue from can. If you have not used this product before, you should obtain a Counter Assault training can and practice with it until you can perform the activities quickly and accurately.

TO ARM AND APPLY: Designed for one-hand operation. Place forefinger through hole in handle with thumb on safety clip curl. With thumb, pull safety clip straight back and off (fig 1). Depress actuator tab for burst of spray (fig 2). Aim at face and eyes of bear. Depress actuator tab for 1-2 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: May cause irreversible eye damage if sprayed in the eye at close range. Contact through touching or rubbing eyes may result in substantial but temporary eye injury. Strongly irritating to nose and skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID: IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses after the first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice. Have product container with you when calling or going for treatment. For emergency medical treatment information call 1-800-535-5053. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor immediately for treatment advice.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

STORAGE AND DISPOSAL

STORAGE: STORE IN A COOL DRY PLACE INACCESSIBLE TO CHILDREN AND PETS. Do not store in places where the temperature is above 120°F nor below 32°F. Do not store in hot vehicle or in direct sunlight. **DISPOSAL:** DO NOT PUNCTURE OR INCINERATE! Non-Refillable Container. Do not reuse or refill this container. If empty: Press valve to release all pressure then place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



Grizzly Bear



Item# CA-12H18H/sb



7 2 2 0 3 1 4 1 4 3 9 6

**COUNTER
ASSAULT**



"Grizzly Tough" Bear Spray Value Pack

Works on all bear
species to deter
bears from
attacking humans

EPA REG. #000401-2

**Produced by a
Grizzly Bear
Encounter
Survivor!**

(story on reverse)



Includes
glue to
the door
safety
warning
with
the spray

Shrugs to 20 foot sprays, 7 minutes of spray time (20%)

Shrugs to 20 foot sprays, 7 minutes of spray time (20%)



DEVELOPED
BY
GRIZZLY BEAR
ENCOUNTER
SURVIVOR
OF ALASKA

2.1 ounces
(230g)

2.1 ounces
(230g)



NET CONTENTS: Combo Pack: TWO - 8.1 ounces (230g)

This product has a range of up to 30 feet (9 meters). The canister empties in approximately 7 seconds.

Produced by a Grizzly Bear Encounter Survivor

In the early 1980's, bear biologists were researching effective bear deterrents. The result of this research was the development of an atomized spray and led to the creation of Counter

Assault. Pride Johnson, President & Chemist of Counter Assault successfully survived a grizzly encounter with Counter Assault Bear Deterrent. The encounter was immediately stopped.

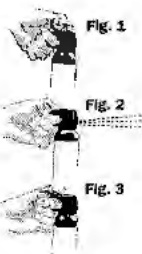
DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

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TO DISARM: Replace safety clip by pushing firmly with thumb until audible "snap" is heard (fig 3). Check to see if safety is completely in place. No gap should be visible between actuator handle and safety clip.



PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

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Disclaimer: To the extent allowable by law, Counter Assault shall not be liable for damage, injury, loss, direct or consequential including death arising out of the use of, or inability to use this product.

Know Your Bears

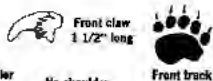
Reprinted with Permission of Be Bear Aware Campaign

Questions or comments:
answers-info@counterassault.com

CHEMICAL EMERGENCY
1-800-535-5053

Manufactured by:
Bushwacker Backpack and Supply Co., Inc.
dba COUNTER ASSAULT
120 Industrial Court, Kalispell, MT 59901
1-800-695-3394 • (406) 257-4740

Black Bear



Grizzly Bear



Item# CA-12HVP/sb





Receipt for Section 3



S: 958534

Milestone Email:

Regulatory Type: Product Registration - Section 3



Resubmission: ☐ Yes ☒ No

Application Type: Notification



Fee For Service: ☐ Yes ☒ No

Print Letter

Enter More Information

Tracking

Company: 55541 BUSHWACKER BACKPACK & SUPPLY CO.



Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91



Product #: 55541-2

Product Name: COUNTER ASSAULT BEAR DETERRENT

Override#:

Me Too

Section3:

Me Too Product

Name:

Application Date: 29-Sep-2014



OPP Rec'd Date: 30-Sep-2014



Front End Date: 30-Sep-2014



Risk Manager Send Date: 30-Sep-2014



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

NOTIFICATION

Receipt Content

De

Paper Label

View/Edit

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐ Signature Date

Form B: ☐ Signature Date:



September 29, 2014

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington VA 22202

Attn: Linda Hollis, Branch Chief, Biochemical Pesticides Branch, Biopesticides and Pollution Prevention Division (BPPD)

Re: Notification per PR Notice 98-10 to make minor label changes

Product: Counter Assault Bear Deterrent

EPA Reg. No.: 55541-2

Company: Bushwacker Backpack and Supply Company, DBA Counter Assault

Dear Ms. Hollis:

On behalf of Bushwacker Backpack and Supply Company, DBA Counter Assault (Counter Assault), we are submitting a notification to make minor label changes for the product Counter Assault Bear Deterrent, EPA Reg. No. 55541-2.

We are adding new packaging combining the EPA approved 8.1 ounce and 10.2 ounce products. There are a few minor text additions and we have highlighted those for your convenience.

Page 9:

- Added "Magnum Value Pack" and added "Both include" to an existing sentence

Page 10:

- Added "Value Pack" and added "Includes" to an existing sentence

Page 11:

- Added "Combo Pack: Two"

The only changes are on the last few pages (pages 9, 11, 12) but we have included the current approved label to ensure completeness in EPA's database. The revised pages are tabbed for your convenience. There are no other changes to the label that EPA approved on 10/29/12.

The following documents are enclosed in support of this notification:

- EPA form 8570-1
- One copy of the revised label (changes highlighted)

If you have questions, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely,

Cristina Griffin

Agent for Bushwacker Backpack & Supply Company DBA Counter Assault

cc: Pride Johnson, Counter Assault



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

NOTIF**Application for Pesticide - Section I**1. Company/Product Number **55541-2**2. EPA Product Manager
Linda Hollis, Branch Chief,

3. Proposed Classification

☐ None ☐ Restricted4. Company/Product (Name) **Bushwacker Backpack and Supply Company, DBA Counter Assault /Counter Assault Bear Deterrent**PM **Biopesticides and Pollution Prevention Division (BPPD)**

5. Name and Address of Applicant (Include ZIP Code)

Counter Assault
c/o Delta Analytical Corp.
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

☐ Check if this is a new address6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II☐ Amendment - Explain below☐ Resubmission in response to Agency letter dated _____☒ Notification - Explain below.☐ Final printed labels in response to Agency letter dated _____☐ "Me Too" Application.☐ Other - explain below.**Notification Accepted**

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification to make minor label changes.Date: **NOV 06 2014**Reviewer: *C. Walsh*

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA

Section - III

1. Material this Product will be Packaged in:

Child-Resistant Packaging

☐ Yes*☐ No*** Certification must be submitted.**

Unit Packaging

☐ Yes☐ No

If "Yes,"

Unit Package wgt. No. per container

Water Soluble Packaging

☐ Yes☐ No

If "Yes,"

Unit Package wgt. No. per container

2. Type of Container

☐ Metal☐ Plastic☐ Glass☐ Paper☐ Other (Specify) _____

3. Location of Net Contents Information

☐ Label☐ Container

4. Size(s) of Retail Container

5. Location of Label Direction

☐ On Label☐ On Labeling accompanying product

6. Manner In Which Label Is Affixed to Product

☐ Lithograph☐ Paper glued☐ Stenciled☐ Other _____**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name

Cristina Griffin

Title

Agent for Counter Assault

Telephone No. (Include Area Code)

301-680-7971**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title

Agent for Counter Assault

4. Typed Name

Cristina Griffin

5. Date

September 29, 2014

6. Date Application Received

(Stamped)

Note-to-File for 55541-2

Re: Incidents

There have been incidents reported on the safety. The registrant regards them as anomalous. If there are further incidents, reviewer should re-engage conversation with registrant/management.

Chris Pfeifer



October 31, 2012

Mr. Chris Pfeifer, Regulatory Action Leader
Biochemical Pesticides Branch, Biopesticides and Pollution Prevention Division
Environmental Protection Agency, Office of Pesticide Programs (7511P)
One Potomac Yard, 2777 S. Crystal Drive, Room S-4900
Arlington VA 22202

Re: Telephone discussion of 10/16/12 regarding Counter Assault

Dear Mr. Pfeifer:

A few days ago you called to discuss questions about a pending amendment, then you mentioned a couple of adverse effects reports EPA had received regarding Counter Assault Bear Deterrent. You explained that EPA had received two reports from people who released spray into hotel rooms when they were trying to use the safety clip to disarm the product. You said that reports had not been received on other products and that the consumer who reported the incident said that he felt the product safety clip should be redesigned.

We are writing to provide information and perspective regarding the complaints.

- First it is important to understand that the manufacturers of bear deterrent all use the same spray head, including safety clip. You can see that the graphics and directions on the EPA approved labels are identical or very similar.
- Second, Counter Assault estimates that all the bear deterrent manufacturing companies combined sell about 300,000 - 400,000 canisters of bear deterrent spray per year. An estimated several million canisters have been sold since EPA first registered bear deterrent sprays in the 1990's. Millions of bear spray canisters have been carried and handled without incident (remember that they all use the same spray head).
- Third, in most incidents that occur with the product, the user did not read the directions or was not following directions properly. The labels provide clear diagrams of how the clip is supposed to look when properly attached to the product. Counter Assault believes that this is the situation with the persons who contacted EPA; they had not read the directions and diagrams about how to disarm the safety clip.
- Fourth, the safety clip is designed to be pulled off quickly in the event of an imminent bear attack. Re-design of the safety clip could inherently reduce the time to deploy the product in an actual bear encounter. Given the rarity of issues with the product in comparison to the number of canisters sold, we do not believe that it would be wise to risk slower response time with such a redesign.

Counter Assault does not believe that there is a general issue with the product, but rather that this is an isolated incident, involving people who did not read the directions and did not handle the product in accordance with the directions.

If you have any questions, please contact me.

Sincerely,


Cristina Griffin
Agent for Counter Assault

Cc: Pride Johnson, Counter Assault

12510 Prosperity Drive Suite 160 Silver Spring, Maryland 20904
(301) 680-7971 fax (301) 680-7975 www.delta-ac.com

*Note - to - File !
There have been incidents reported on the safety. The registrant regards them as anomalous. If there are further incidents reviewer should*

*reengage
consumer
JCP*



Re: Fw: Counter Assault Bear Spray , 55541-2 
Norman Spurling to: Chris Pfeifer

06/08/2012 11:16 AM

From: Norman Spurling/DC/USEPA/US
To: Chris Pfeifer/DC/USEPA/US@EPA

History: This message has been replied to.

I've added this to IDS as I024111, but Dennis's email on 4/30/2012 talks about two incidents, and details seem to be missing on the second one. He mentions NY but the man at Yellowstone was from NJ. Has he provided any details about the second one?

Norman Spurling
6(a)(2) Coordination and Analysis Team Leader
OPP/ITRMD/ISB
703-305-5835

Chris Pfeifer

Hi Norm, I'm not sure where/how to report this. ...

06/07/2012 01:39:07 PM

From: Chris Pfeifer/DC/USEPA/US
To: Norman Spurling/DC/USEPA/US@EPA
Date: 06/07/2012 01:39 PM
Subject: Fw: Counter Assault Bear Spray , 55541-2

Hi Norm,

I'm not sure where/how to report this. The registrant might have reported it already as the complaint was made to them. (Note: A follow-up email with attachment is also coming your way.)

Regards,
Chris
EPA BPPD
703-308-0031

----- Forwarded by Chris Pfeifer/DC/USEPA/US on 06/07/2012 01:36 PM -----

From: Dennis Jaramillo/R8/USEPA/US
To: Chris Pfeifer/DC/USEPA/US@EPA
Date: 04/30/2012 05:58 PM
Subject: Fw: Counter Assault Bear Spray , 55541-2

Chris,

I got your name from Dan Peacock, who indicated you are the contact for Counter Assault Bear Spray. Region 8 received a complaint from a gentleman in NY who said during a camping trip to Montana, that a canister of Counter Assault discharged after the safety was replaced (incorrectly). According to the Complainant, he was in the back country camping and on his way home he was packing his gear and the safety was allowed to be replaced upside down or something which caused the bear spray to discharge. The Complainant called and wrote a letter to the Registrant to relay this incident and requested the Registrant to modify the safety. The Registrant was not receptive to this person suggesting there was something wrong with their product. Additionally there were two possible discharges because of the safety for Counter Assault. One in a visitor Center in Yellowstone National Park (I have called the rangers there to verify that the incident was in deed caused by the safety), and one instance where the Counter Assault discharged because of the safety in addition to the one the person in NY was involved in. In order to follow up on this complaint as best I can, is there anything we can do regarding the design of the safety on the Counter Assault Bear Spray? Have you heard of instances like this before? Any advice

or suggestions are greatly appreciated.

Regards,

Dennis

Dennis Jaramillo
Office of Enforcement, Compliance and Environmental Justice (8-ENF-UFO)
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129
Ph: 303-312-6203
Fax: 303-312-6953

----- Forwarded by Dennis Jaramillo/R8/USEPA/US on 04/25/2012 04:02 PM -----

From: Dan Peacock/DC/USEPA/US
To: Dennis Jaramillo/R8/USEPA/US@EPA
Cc: Chris Pfeifer/DC/USEPA/US@EPA
Date: 04/25/2012 01:38 PM
Subject: Re: Counter Assault Bear Spray , 55541-2

Dennis,

I enjoyed talked with you today.

Chris Pfeifer is the contact in the Biopesticides and Pollution Prevention Division (BPPD) who will be handling the dog and bear attack repellents containing the actives, "capsaicin and related capsaicinoids".

With respect to the person who accidentally sprayed himself in a hotel room, I would suggest forwarding the facts as provided by the person to the registrant and ask him if there is anything that he may want to change about the labeling or safety clip that may prevent the problem in the future. You can copy Mr. Pfeifer.

I suggestion would be to give the company 90 days to respond.

Then determine if more follow-up is needed.

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:
United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

-----Dennis Jaramillo/R8/USEPA/US wrote: -----

To: Dan Peacock/DC/USEPA/US@EPA
From: Dennis Jaramillo/R8/USEPA/US
Date: 04/25/2012 11:07AM
Cc: John Hebert/DC/USEPA/US@EPA
Subject: Counter Assault Bear Spray

Dan,

Thanks for talking with me this morning the bear spray complaint the Region received. Could you please let me know who in the Registration Division I should cc on a letter to the complainant.

Regards,

Dennis

Dennis Jaramillo
Office of Enforcement, Compliance and Environmental Justice (8-ENF-UFO)
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129
Ph: 303-312-6203
Fax: 303-312-6953



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

APR 25 2014

Ref: 8ENF-UFO

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Pride Johnson, Registered Agent
Bushwacker Backpack & Supply Company, Inc.
120 Industrial Court
Kalispell, Montana 59901

Re: Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)
Notice of Warning

Dear Mr. Johnson:

This letter constitutes a Notice of Warning issued to Bushwacker Backpack and Supply Company, Inc., (Bushwacker) pursuant to section 9(c)(3) of FIFRA, 7 U.S.C. § 136g(c)(3), and notifies you that Bushwacker has failed to comply with section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), by making false or misleading claims associated with the sale and distribution of a registered pesticide, Counter Assault bear spray (EPA Reg. No. 55541-2).

Based on information provided to the United States Environmental Protection Agency, Region 8 (EPA) and a review of this information, EPA has determined that claims on your website are false and misleading. Specifically, the listing of federal agencies in your website that use Counter Assault implies a product endorsement or recommendation by these federal agencies, which is in violation of 40 C.F.R. § 156.10(a)(5)(v).

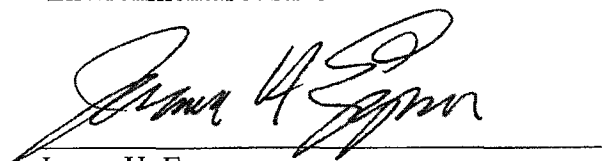
This letter serves as a Notice of Warning under FIFRA and advises you that future violations of any provisions of this law may subject you to civil or criminal penalties. Although no reply to this letter is necessary, you need to take all necessary actions to prevent the recurrence of the above violation. The EPA will conduct a follow-up inspection at your facility to ensure that corrective actions have been taken. If you have any questions regarding this Notice of Warning, you may contact Dennis Jaramillo at 303-312-6203.

Please note the enclosed Small Business Regulatory Enforcement Fairness Act (SBREFA) information fact sheet. The EPA has agreed to notify small businesses of their rights pursuant to SBREFA to comment to the SBREFA ombudsman regarding any regulatory enforcement activity. SBREFA neither eliminates your responsibility to comply nor creates any new rights or defenses under law.

Sincerely,



Mark A.R. Chalfant
Acting Director
UIC/FIFRA/OPA Technical
Enforcement Programs
Office of Enforcement, Compliance and
Environmental Justice



James H. Eppers
Supervisory Attorney
Regulatory Enforcement Unit
Legal Enforcement Program
Office of Enforcement, Compliance and
Environmental Justice

Enclosure: Small Business Regulatory Enforcement Fairness Act (SBREFA) information fact sheet.



**UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
SUPPLEMENTAL CASE/INCIDENT RECORD**

ORGANIZATIONAL (PARK) NAME Yellowstone National Park		CASE INCIDENT NUMBER 11-3052
LOCATION OF INCIDENT Albright Visitor Center Mammoth		DATE OF INCIDENT 07/18/2011
NATURE OF INCIDENT Accidental discharge of bear spray in Albright Visitor Center		
COMPLAINANT'S NAME		COMPLAINANT'S ADDRESS

On July 18, 2011 while on duty in Yellowstone National Park, I was dispatched to Albright Visitor center for a discharged bear spray in the front doors of the visitor center.

Upon arrival on scene, everyone within the building evacuated to 20 yards from the entrance to the visitor center. Mammoth fire dealt with the biohazard.

██████████ later identified by his valid New Jersey driver's license, confessed to accidentally spraying the bear spray in the entrance of the Albright Visitor Center. ██████████ tested his bear spray earlier in a field, and placed the safety cap on upside down. When ██████████ showed his friend how to use the bear spray (with safety cap on), it sprayed due to the space created between the safety cap and the bottle. ██████████ was warned and shown how to correctly use his bear spray.

No injuries were reported from anyone within the building. However, two women, Park Ranger Debbie Van Winkle and visitor ██████████ walked to the Mammoth Clinic prior to my arrival on scene. ██████████ reported to me later that she was sprayed by bear spray on her arm. ██████████ refused any additional treatment.

All units were clear at 11:54 hours.

Personal privacy information

SUBMITTED BY (SIGNATURE AND DATE) John Forsythe	APPROVED BY (SIGNATURE AND DATE) <i>Kath C. Young</i> 1297 July 20, 2011
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Inert ingredient information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Contains
CBI

October 17, 2007

MEMORANDUM

SUBJECT: Approval of [REDACTED] For Use Only In
Bear Repellents

FROM: Deborah McCall, Acting Branch Chief
Inert Ingredient Assessment Branch
Registration Division (7505P) *DMC 10/17/07*

TO: Dan Peacock
Insecticide - Rodenticide Branch
Registration Division (7505P)

The Inert Ingredient Assessment Branch (IIAB) has approved the use of [REDACTED] as a inert ingredient that can only be used in pesticide products applied as bear repellents. This chemical is not approved for use in pesticides applied to any other use site, including food. A record has been created in OPPIN that clearly stipulates that the chemical can only be used in bear repellents.

Please contact Karen Angulo (703-306-0404) with questions.

CERTIFICATION STATEMENT

I hereby certify that, for purposes of FIFRA § 12(a)(1)(C), the description of the composition of "**COUNTER ASSAULT BEAR DETERRENT**", EPA File Symbol No. 55541- refers to the composition set forth on the Statement of Formula and supporting materials. This description includes the representations that:

- 1) no ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit specified for that ingredient in a currently approved Statement of Formula; and
- 2) if the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.

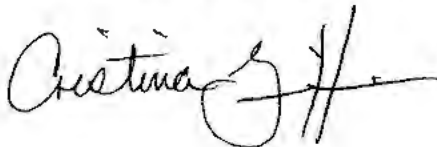
Company:

BUSHWACKER BACKPACK & SUPPLIES CO., INC.

Company Agent:

CRISTINA GRIFFIN

Signature:

A handwritten signature in black ink, appearing to read 'Cristina Griffin', with a stylized flourish at the end.

Date:

7/22/97

